# **EXHIBIT 13**

# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (GBD)(FM)

**ECF Case** 

This document relates to: All Actions

# PLAINTIFFS' AMENDED INITIAL DISCLOSURES

Plaintiffs in all actions in this MDL submit the following Amended Initial Disclosures under Federal Rule of Civil Procedure 26(a)(1). Plaintiffs make these disclosures based on information currently available to them. Plaintiffs reserve their right, under the Federal Rules of Civil Procedure, to supplement these disclosures as further information becomes known. Furthermore, Plaintiffs specifically reserve their right to assert the attorney-client privilege, the work product doctrine, or any other applicable privilege relating to any document identified within these Initial Disclosures. By identifying documents herein, Plaintiffs do not waive the attorney-client privilege, the work product doctrine, or any other applicable privilege. Moreover, by referring to or producing documents in the Initial Disclosure process, Plaintiffs make no representations or concessions regarding the relevancy or appropriateness of any particular documents or types of documents.

# I. INDIVIDUALS WITH RELEVANT DISCOVERABLE INFORMATION

Plaintiffs in these consolidated proceedings identify the following individuals as those who may have discoverable information with respect to Plaintiffs' claims. Plaintiffs do not

consent to or authorize any communication prohibited by any applicable rule of professional conduct.

- A. All individuals named as defendants in Plaintiffs' operative Complaints. Individuals include, but are not limited to:
  - 1. Osama bin Laden

Address: Unknown

<u>Subject</u>: Individual has information regarding a number of subject matters relative to Plaintiffs' claims, including without limitation: (i) the origins of al Qaeda; (ii) the financial and logistical infrastructure created to support al Qaeda; (iii) al Qaeda's funding, including support from purported Islamic charitable organizations, Islamic financial institutions, and foreign states such as Saudi Arabia; (iv) al Qaeda's-related terrorist attacks or plots; (v) al Qaeda's expansion and participation in other regional jihad campaigns; and (vi) al Qaeda's association with related terrorist organizations.

2. Ayman al Zawahiri

Address: Unknown

Subject: Id.

3. Khalid Sheikh Mohammed

Address: United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba.

Subject: Id.

4. Abu Zubaydah

Address: United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba.

Subject: Id.

5. Ramzi Binalshibh

Address: United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba.

Subject: Id.

6. Wa'el Hamza Jelaidan

Address: Unknown

Subject: Id.

7. Sheikh Safer al Hawali

Address: Unknown

Subject: Id.

8. Saleh al Hussayen

Address: Unknown

# 9. Sheikh Salman al Oadah

Address: Unknown

Subject: Id.

# 10. Ibn al Shaykh al Libi

Address: Unknown

Subject: Id.

#### 11. Bakr bin Laden

<u>Address</u>: Upon information and belief, the individual can be contacted through the Saudi Binladin Group, Prince Abdullah Street, P.O. Box 122962, 21332, Jeddah Saudi Arabia.

Subject: Id.

# 12. Abdullah bin Laden

<u>Address</u>: Upon information and belief, the individual can be contacted through the Saudi Binladin Group, Prince Abdullah Street, P.O. Box 122962, 21332, Jeddah Saudi Arabia.

Subject: Id.

#### 13. Omar bin Laden

Address: Upon information and belief, the individual can be contacted through the Saudi Binladin Group, Prince Abdullah Street, P.O. Box 122962, 21332, Jeddah Saudi Arabia.

Subject: Id.

# 14. Tariq bin Laden

Address: Upon information and belief, the individual can be contacted through the Saudi Binladin Group, Prince Abdullah Street, P.O. Box 122962, 21332, Jeddah Saudi Arabia.

Subject: Id.

# 15. Yeslam bin Laden

Address: Upon information and belief, the individual can be contacted through the Saudi Binladin Group, Prince Abdullah Street, P.O. Box 122962, 21332, Jeddah Saudi Arabia.

Subject: Id.

# 16. Abdulrahman Bin Mahfouz

Address: Unknown

Subject: Id.

### 17. Yassin al Kadi

Address: Unknown

#### 18. Yousef Jameel

Address: Unknown

Subject: Id.

#### 19. Suleiman al Rajhi

Address: Unknown

Subject: Id.

#### 20. Abdullah al Rajhi

Address: Unknown

Subject: Id.

#### 21. Saleh Abdulaziz al Rajhi

Address: Unknown

Subject: Id.

#### 22. Shahir A. Batterjee

Address: Unknown

Subject: Id.

#### 23. Abdullah bin Saleh al Obaid

Address: Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W.,

Suite 900, Washington, D.C. 20036.

Subject: Id.

#### 24. Abdul Rahman al Swailem

Address: Unknown

Subject: Id.

#### 25. Abdullah Muhsen al Turki

Address: Unknown

Subject: Id.

#### 26. Abdullah Omar Naseef

Address: Unknown

Subject: Id.

#### 27. Sulaiman al Ali

Address: Unknown

Subject: Id.

#### 28. Sami Omar al Hussayen

Address: Unknown

Subject: Id.

#### 29. Adnan Basha

Address: Upon information and belief, the individual can be contacted through

the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Id.

### 30. Perouz Sedaghaty

Address: Upon information and belief, the individual is incarcerated in the United States and can be contacted through the attorneys at Bernabei & Wachtel, 1775 T Street, N.W., Washington, D.C. 20009.

Subject: Id.

### 31. Soliman al Buthe

Address: Upon information and belief, the individual can be contacted through the attorneys at Bernabei & Wachtel, 1775 T Street, N.W., Washington, D.C. 20009.

Subject: Id.

# 32. Aqeel Abdulaziz al Aqil

Address: Unknown

Subject: Id.

## 33. Mansour al Kadi

Address: Unknown

Subject: Id.

### 34. Talal M. Badkook

Address: Unknown

Subject: Id.

# 35. Mohammed Ali Sayed Mushayt

Address: Unknown

Subject: Id.

### 36. Samir Salah

<u>Address</u>: Upon information and belief, the individual can be contacted through the attorneys at Luque Marino, 910 17<sup>th</sup> Street, N.W., Suite 800, Washington, D.C. 20006, and Law Office of Steven Barentzen, 1575 Eye Street, N.W., Suite 300, Washington, D.C. 20005.

Subject: Id.

### 37. Ahmed Totonji

<u>Address</u>: Upon information and belief, the individual can be contacted through the attorneys at Luque Marino, 910 17<sup>th</sup> Street, N.W., Suite 800, Washington, D.C. 20006, and Law Office of Steven Barentzen, 1575 Eye Street, N.W., Suite 300, Washington, D.C. 20005.

# 38. Mohammed Jaghlit

<u>Address</u>: Upon information and belief, the individual resides in the United States. Subject: *Id*.

### 39. M. Omar Ashraf

Address: Upon information and belief, the individual can be contacted through the attorneys at Luque Marino, 910 17<sup>th</sup> Street, N.W., Suite 800, Washington, D.C. 20006, and Law Office of Steven Barentzen, 1575 Eye Street, N.W., Suite 300, Washington, D.C. 20005.

Subject: Id.

### 40. Muhammed Ashraf

<u>Address</u>: Upon information and belief, the individual can be contacted through the attorneys at Luque Marino, 910 17<sup>th</sup> Street, N.W., Suite 800, Washington, D.C. 20006, and Law Office of Steven Barentzen, 1575 Eye Street, N.W., Suite 300, Washington, D.C. 20005.

Subject: Id.

### 41. Iqbal Yunus

Address: Upon information and belief, the individual can be contacted through the attorneys at Luque Marino, 910 17<sup>th</sup> Street, N.W., Suite 800, Washington, D.C. 20006, and Law Office of Steven Barentzen, 1575 Eye Street, N.W., Suite 300, Washington, D.C. 20005.

Subject: Id.

# 42. M. Yaqub Mirza

Address: Upon information and belief, the individual can be contacted through the attorneys at Luque Marino, 910 17<sup>th</sup> Street, N.W., Suite 800, Washington, D.C. 20006, and Law Office of Steven Barentzen, 1575 Eye Street, N.W., Suite 300, Washington, D.C. 20005.

Subject: Id.

### 43. Jamal Barzinji

<u>Address</u>: Upon information and belief, the individual can be contacted through the attorneys at Luque Marino, 910 17<sup>th</sup> Street, N.W., Suite 800, Washington, D.C. 20006, and Law Office of Steven Barentzen, 1575 Eye Street, N.W., Suite 300, Washington, D.C. 20005.

Subject: Id.

### 44. Ahmed Idris Nasreddin

Address: Unknown

Subject: Id.

### 45. Youssef M. Nada

Address: Unknown

# 46. Chafiq bin Muhammad Ayadi

Address: Unknown

Subject: Id.

# 47. Wadih El Hage

Address: Upon information and belief, the individual is incarcerated in the United States and can be contacted through the Department of Justice and/or the Federal Bureau of Prisons.

Subject: Id.

### 48. Bensayah Belkacem

Address: United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba.

Subject: Id.

### 49. Sabar Lamar

Address: Upon information and belief, the individual resides in France.

Subject: Id.

### 50. Wali Khan Amin Shah

Address: Upon information and belief, the individual is incarcerated in the United States and can be contacted through the Department of Justice and/or the Federal Bureau of Prisons.

Subject: Id.

#### 51. Enaam M. Arnanout

Address: Upon information and belief, the individual is incarcerated in the United States and can be contacted through the Department of Justice and/or the Federal Bureau of Prisons.

Subject: Id.

### 52. Abdulrahman Alamoudi

<u>Address</u>: Upon information and belief, the individual is incarcerated in the United States and can be contacted through the Department of Justice and/or the Federal Bureau of Prisons.

Subject: Id.

#### 53. Ahmed Ressam

Address: Upon information and belief, the individual is incarcerated in the United States and can be contacted through the Department of Justice and/or the Federal Bureau of Prisons.

Subject: Id.

# 54. Abdul Aziz bin Ibrahim al Ibrahim

Address: Unknown

55. Muhammad Atif

Address: Unknown

Subject: Id.

56. Sayf al Adl

Address: Unknown

Subject: Id.

57. Abu Hafs the Mauritanian

Address: Unknown

Subject: Id.

58. Abd al Hadi al Iraqi

Address: Unknown

Subject: Id.

59. Thirwat Salah Shihata

Address: Unknown

Subject: Id.

60. Tariq Anwar al Sayyid Ahmad

Address: Unknown

Subject: Id.

61. Muhammad Salah

Address: Unknown

Subject: Id.

62. Nurjaman Riduan Ismuddin

Address: United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba.

Subject: Id.

63. Mohammed Iqbal Abdurrahman

Address: Unknown

Subject: Id.

64. Mounir El Motassadeq

Address: Unknown

Subject: Id.

65. Said Bahaji

Address: Unknown

Subject: Id.

66. Adel Ben Soltane

Address: Unknown

67. Nabil Benattia

Address: Unknown

Subject: Id.

68. Yassine Chekkouri

Address: Unknown

Subject: Id.

69. Riadh Jelassi

Address: Unknown

Subject: Id.

70. Mendi Kammoun

Address: Unknown

Subject: Id.

71. Samir Kishk

Address: Unknown

Subject: Id.

72. Tarek Ben Habib Maaroufi

Address: Unknown

Subject: Id.

73. Abdelhalim Remadna

Address: Unknown

Subject: Id.

74. Mansour Thaer

Address: Unknown

Subject: Id.

75. Lazhar Ben Mohammed Tlili

Address: Unknown

Subject: Id.

76. Habib Waddani

Address: Unknown

Subject: Id.

77. Abdelkadir Mahmoud Es Sayed

Address: Unknown

Subject: Id.

78. Khalid al Fawaz

Address: Unknown

79. Abu Hamza al Masri Address: Unknown

Subject: Id.

80. Mohamed Ben Belgacem Aouadi

Address: Unknown

Subject: Id.

81. Mokhtar Boughougha

Address: Unknown

Subject: Id.

82. Tarek Charaabi

Address: Unknown

Subject: Id.

83. Sami Ben Khemais Essid

Address: Unknown

Subject: Id.

84. Lased Ben Heni

Address: Unknown

Subject: Id.

85. Bashir Ud Din Mahmood

Address: Unknown

Subject: Id.

86. Abdul Majeed

Address: Unknown

Subject: Id.

87. S.M. Tufail

Address: Unknown

Subject: Id.

88. Hussein Mahmud Abdullkadir

Address: Unknown

Subject: Id.

89. Abdirasik Aden

Address: Unknown

Subject: Id.

90. Abbas Abdi Ali

Address: Unknown

91. Abdi Adulaziz Ali
<u>Address</u>: Unknown
<u>Subject</u>: *Id*.

92. Yusaf Ahmed Ali
<u>Address</u>: Unknown
Subject: *Id*.

93. Ali Ghaleb Himmat Address: Unknown Subject: *Id*.

94. Albert Fredrich Armand Huber Address: Unknown Subject: *Id.* 

95. Liban Hussein

Address: Unknown
Subject: Id.

96. Abdullahi Hussein Kahie

<u>Address</u>: Unknown

Subject: *Id.* 

97. Mohammed Mansour Address: Unknown Subject: *Id*.

98. Zeinab Mansour Fattah
Address: Unknown
Subject: *Id.* 

99. Abdullah Ahmed Abdullah Address: Unknown Subject: *Id.* 

100. Haji Abdul Manan Agha <u>Address</u>: Unknown Subject: *Id*.

101. Muhammad al Hamati
<u>Address</u>: Unknown
Subject: *Id*.

102. Amin al Haq
Address: Unknown
Subject: Id.

103. Saqar al Sadawi Address: Unknown

Subject: Id.

104. Ahmad Sa'Id al Kadr

Address: Unknown

Subject: Id.

105. Anas al Liby

Address: Unknown

Subject: Id.

106. Ahmad Ibrahim al Mughassil

Address: Unknown

Subject: Id.

107. Abdelkarim Hussein Mohamed al Nasser

Address: Unknown

Subject: Id.

108. Sa'D al Sharif

Address: Unknown

Subject: Id.

109. Ibrahim Salih Mohammed al Yacoub

Address: Unknown

Subject: Id.

110. Ahmed Mohammed Hamed Ali

Address: Unknown

Subject: Id.

111. Ali Atwa

Address: Unknown

Subject: Id.

112. Bilal bin Marwan

Address: Unknown

Subject: Id.

113. Mamoun Darkazanli

Address: Unknown

Subject: Id.

114. Ali Saed Bin Ali El Hoorie

Address: Unknown

115. Mustafa Mohamed Fadhil

Address: Unknown

Subject: Id.

116. Ahmed Khalfan Ghailani

Address: Upon information and belief, the individual is incarcerated in the United States and can be contacted through the Department of Justice and/or the Federal Bureau of Prisons.

Subject: Id.

117. Riad Hijazi

Address: Unknown

Subject: Id.

118. Hasan Izz al Din

Address: Unknown

Subject: Id.

119. Mufti Rashid Ahmad Ladehyanoy

Address: Unknown

Subject: Id.

120. Fazul Abdullah Mohammed

Address: Unknown

Subject: Id.

121. Fahid Mohammed Ally Msalam

Address: Unknown

Subject: Id.

122. Youssef Abdaoui

Address: Unknown

Subject: Id.

123. Mohammed Amine Akli

Address: Unknown

Subject: Id.

124. Mohrez Amdouni

Address: Unknown

Subject: Id.

125. Chiheb Ben Mohamed Ayari

Address: Unknown

126. Mondher Baazaoui
Address: Unknown

Subject: Id.

127. Lionel Dumont

<u>Address</u>: Unknown

<u>Subject</u>: *Id*.

128. Moussa Ben Amor Essaadi
Address: Unknown
Subject: *Id.* 

129. Rachid Fehar

<u>Address</u>: Unknown

<u>Subject</u>: *Id*.

130. Brahim Ben Hedili Hamami

<u>Address</u>: Unknown

<u>Subject</u>: *Id*.

131. Khalil Jarraya

<u>Address</u>: Unknown
Subject: *Id*.

132. Mounir Ben Habib Jerraya

<u>Address</u>: Unknown

<u>Subject</u>: *Id*.

133. Fouzi Jendoubi

<u>Address</u>: Unknown

<u>Subject</u>: *Id*.

134. Fethi Ben Rebai Masri Address: Unknown Subject: *Id*.

135. Najib Ouaz

Address: Unknown
Subject: Id.

136. Ahmed Hasni Rarrbo
Address: Unknown
Subject: Id.

137. Nedal Saleh

<u>Address</u>: Unknown

Subject: *Id*.

138. Abdelghani Mzoudi
Address: Unknown
Subject: Id.

139. Gulbuddin Hekmatyar

<u>Address</u>: Unknown

Subject: *Id*.

140. Imad Mughniyeh

<u>Address</u>: Unknown

Subject: *Id*.

141. Muhammad Omar

<u>Address</u>: Unknown

<u>Subject</u>: *Id*.

142. Osama Bassnan

<u>Address</u>: Unknown

<u>Subject</u>: *Id*.

143. Fahad al Thumairy

<u>Address</u>: Unknown

Subject: *Id*.

144. Sheikh Ahmed Salim Swedan Address: Unknown Subject: *Id*.

145. Muhammad Abu Islam
<u>Address</u>: Unknown
Subject: *Id*.

146. Abdullah Qassim

<u>Address</u>: Unknown

Subject: *Id*.

147. Hashim Abdulrahman

<u>Address</u>: Unknown

<u>Subject</u>: *Id*.

148. Jamal al Badawi
Address: Unknown
Subject: *Id*.

149. Mohammed Omar al Harazi Address: Unknown Subject: *Id*.

150. Walid al Sourouri

Address: Unknown

Subject: Id.

151. Fatha Adbul Rahman

Address: Unknown

Subject: Id.

152. Yasser al Azzani

Address: Unknown

Subject: Id.

153. Jamal Ba Khorsh

Address: Unknown

Subject: Id.

154. Ahmad al Shinni

Address: Unknown

Subject: Id.

155. Jamil Qasim Saeed

Address: Unknown

Subject: Id.

156. Mohammed Loay Bayazid

Address: Unknown

Subject: Id.

157. Sheikh Omar Bakri Muhammad

Address: Unknown

Subject: Id.

158. Abdul Fattah Zammar

Address: Unknown

Subject: Id.

159. Ghasoub al Abrash Ghalyoun

Address: Unknown

Subject: Id.

160. Zacarias Moussaoui

Address: Upon information and belief, the individual is incarcerated in the United States and can be contacted through the Department of Justice and/or the

Federal Bureau of Prisons.

161. The Taliban

Address: Unknown

Subject: Id.

162. Abdel Hussein

Address: Unknown

Subject: Id.

163. Hassan al Turabi

Address: Unknown

Subject: Id.

164. Abd Al Mushin al Libi

Address: Unknown

Subject: Id.

165. Abdul Rahman Yasin

Address: Unknown

Subject: Id.

166. Prince Naif bin Abdulaziz al Saud

Address: Upon information and belief, the individual resides in Saudi Arabia.

Subject: Id.

167. Prince Sultan bin Abdulaziz al Saud

Address: Upon information and belief, the individual resides in Saudi Arabia.

Subject: Id.

168. Prince Mohammed Al Faisal al Saud

Address: Upon information and belief, the individual resides in Saudi Arabia.

Subject: Id.

169. Prince Turki Al Faisal al Saud

Address: Upon information and belief, the individual resides in Saudi Arabia.

Subject: Id.

170. Prince Salman Bin Abdul Aziz al Saud

Address: Upon information and belief, the individual resides in Saudi Arabia.

Subject: Id.

171. Rabih Haddah

Address: Unknown

Subject: Id.

172. Sheikh Abu Bdul Aziz Nagi

Address: Unknown

173. Wadi al Aqiq
Address: Unknown
Subject: *Id*.

174. Al Shaykh al Iraqi
Address: Unknown
Subject: Id.

175. Abu Hajer al Iraqi
Address: Unknown
Subject: *Id*.

176. Saleh Abdullah Kamel Address: Unknown Subject: *Id*.

177. Mohammad S. Mohammad Address: Unknown Subject: *Id*.

178. Mustasim Abdel Rahim Address: Unknown Subject: *Id*.

179. Mohamed Sadeek Odeh
<u>Address</u>: Unknown
Subject: *Id*.

180. Mahdi Chamran Savehi <u>Address</u>: Unknown Subject: *Id*.

181. Mohammed Sarkawi
Address: Unknown
Subject: Id.

182. Haji Mohamad Akram Address: Unknown Subject: *Id.* 

183. Abdallah Omar

<u>Address</u>: Unknown

<u>Subject</u>: *Id*.

184. Umar Faruq

Address: Unknown
Subject: Id.

185. Abd al Rahim al Nashiri

Address: Unknown

Subject: Id.

186. Muhammed Galeb Kalaje Zoaaydi

Address: Unknown

Subject: Id.

187. Mullah Kakshar

Address: Unknown

Subject: Id.

188. Arafat El Asahi

Address: Unknown

Subject: Id.

189. Abdul Aziz Al Ibrahim

Address: Unknown

Subject: Id.

190. Mohammed Bahareth

Address: Unknown

Subject: Id.

191. Dr. Mohaman Ali Elgari

Address: Unknown

Subject: Id.

192. Salim bin Mahfouz

Address: Unknown

Subject: Id.

193. Saif al Islam El Masry

Address: Unknown

Subject: Id.

194. Syed Suleman Ahmer

Address: Unknown

Subject: Id.

195. Mazin M.H. Bahareth

Address: Unknown

Subject: Id.

196. Zahir H. Kazmi

Address: Unknown

197. Muzaffar Khan

<u>Address</u>: Unknown

<u>Subject</u>: *Id*.

198. Jamal Nyrabeh
Address: Unknown
Subject: Id.

199. Ahmad Ajaj

<u>Address</u>: Unknown

<u>Subject</u>: *Id*.

200. Mohammed Omeish
Address: Unknown
Subject: Id.

201. Mahmoud Jaballah
<u>Address</u>: Unknown
<u>Subject</u>: *Id*.

202. Arafat El Ashi
Address: Unknown
Subject: Id.

203. Jamal Ahmed Mohammed Address: Unknown Subject: *Id*.

204. Mohammed Khatib

<u>Address</u>: Unknown

<u>Subject</u>: *Id*.

205. Tarik Hamdi

Address: Unknown

Subject: Id.

206. Fazeh Ahed

<u>Address</u>: Unknown

<u>Subject</u>: *Id*.

207. Khaled Nouri

<u>Address</u>: Unknown

<u>Subject</u>: *Id*.

208. Abdullah M. al Mahdi <u>Address</u>: Unknown <u>Subject</u>: *Id*. 209. Tareq M. al Swaidan

<u>Address</u>: Unknown

<u>Subject</u>: *Id*.

210. Abdul al Moslah

<u>Address</u>: Unknown
Subject: *Id.* 

211. Salah Badahdh

<u>Address</u>: Unknown

<u>Subject</u>: *Id*.

212. Hassan A.A. Bahafzallah Address: Unknown Subject: *Id.* 

213. Ihab Ali

Address: Unknown
Subject: Id.

214. Ibrahim Hassabella
Address: Unknown
Subject: Id.

215. Hisham al Talib

<u>Address</u>: Unknown

<u>Subject</u>: *Id*.

216. Cherif Sedky

<u>Address</u>: Unknown

Subject: *Id*.

217. Omar Al Bayoumi

<u>Address</u>: Unknown

<u>Subject</u>: *Id*.

218. Adel Muhammad Sadiq Bin Kazem
Address: Unknown
Subject: *Id*.

219. Zeinab Mansour-Fattouh
Address: Unknown
Subject: *Id*.

220. Mohammed Chehade Address: Unknown Subject: *Id*.

### 221. Hazem Ragab

Address: Unknown

Subject: Id.

### 222. Mustafa al Kadir

Address: Unknown

Subject: Id.

### 223. Abu al Maid

Address: Unknown

Subject: Id.

### 224. Taha Jaber al Alwani

Address: Upon information and belief, the individual can be contacted through the attorneys at Luque Marino, 910 17<sup>th</sup> Street, N.W., Suite 800, Washington, D.C. 20006, and Law Office of Steven Barentzen, 1575 Eye Street, N.W., Suite 300, Washington, D.C. 20005.

Subject: Id.

### 225. Ibrahim S. Abdullah

Address: Unknown

Subject: Id.

### 226. Dr. Mahmoud Dakhil

Address: Unknown

Subject: Id.

### 227. Ghasoub al Abrash

Address: Unknown

Subject: Id.

### 228. Mustafa Ahmed al Hisawi

Address: United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba.

Subject: Id.

### 229. Imad Eddin Barakat Yarkas

Address: Unknown

Subject: Id.

# 230. Muhammed Galeb Kalaje Zuoyadi

Address: Unknown

Subject: Id.

### 231. Bassam Dalati Satut

Address: Unknown

232. Abdalrahman Alarnout Abu Aljer

Address: Unknown

Subject: Id.

233. Mohammed Khair al Sagga

Address: Unknown

Subject: Id.

234. Ghasoub al Abrash Ghalyoun

Address: Unknown

Subject: Id.

235. Abu Qatada al Filistini

Address: Unknown

Subject: Id.

236. Yassir al Sirri

Address: Unknown

Subject: Id.

237. Mohammed al Massari

Address: Unknown

Subject: Id.

238. Ziyad Khaleel

Address: Unknown

Subject: Id.

239. Mamdouh Mahmud Salim

Address: Unknown

Subject: Id.

240. Abdullah Samil Bahmadan

Address: Unknown

Subject: Id.

241. Essam al Ridi

Address: Unknown

Subject: Id.

242. Omar Abu Omar

Address: Unknown

Subject: Id.

243. Mohammed Ali Hasan al Moayad

Address: Unknown

244. Ibrahim Muhammed Afandi

Address: Unknown

Subject: Id.

245. Abdulrahman Hassan Sharbatly

Address: Unknown

Subject: Id.

246. Mohammed al Issai

Address: Unknown

Subject: Id.

247. Ahmed Brahim

Address: Unknown

Subject: Id.

248. Abu Ibrahim al Masri

Address: Unknown

Subject: Id.

249. Salman al Ouda

Address: Unknown

Subject: Id.

250. Muhammed J. Fakihi

Address: Unknown

Subject: Id.

251. Agus Budiman

Address: Unknown

Subject: Id.

252. Said Bahaji

Address: Unknown

Subject: Id.

253. Zakariya Essabar

Address: Unknown

Subject: Id.

B. All individuals affiliated with the entities named as defendants in Plaintiffs' operative Complaints, including without limitation, all current or former officers, directors, trustees, employees, attorneys, consultants, accountants, agents, or representatives associated with the entity defendant. Individuals include, but are not limited to:

1. Bakr bin Laden

Address: Upon information and belief, the individual can be contacted through the Saudi Binladin Group, Prince Abdullah Street, P.O. Box 122962, 21332,

Jeddah Saudi Arabia.

<u>Subject</u>: Individual has information regarding a number of subject matters relative to Plaintiffs' claims, including without limitation: (i) the origins of al Qaeda; (ii) the financial and logistical infrastructure created to support al Qaeda; (iii) al Qaeda's funding, including support from purported Islamic charitable organizations, Islamic financial institutions, and foreign states such as Saudi Arabia; (iv) al Qaeda's-related terrorist attacks or plots; (v) al Qaeda's expansion and participation in other regional jihad campaigns; and (vi) al Qaeda's association with related terrorist organizations.

### 2. Abdullah bin Laden

<u>Address</u>: Upon information and belief, the individual can be contacted through the Saudi Binladin Group, Prince Abdullah Street, P.O. Box 122962, 21332, Jeddah Saudi Arabia.

Subject: Id.

# 3. Omar bin Laden

Address: Upon information and belief, the individual can be contacted through the Saudi Binladin Group, Prince Abdullah Street, P.O. Box 122962, 21332, Jeddah Saudi Arabia.

Subject: Id.

# 4. Tariq bin Laden

Address: Upon information and belief, the individual can be contacted through the Saudi Binladin Group, Prince Abdullah Street, P.O. Box 122962, 21332, Jeddah Saudi Arabia.

Subject: Id.

### 5. Yeslam bin Laden

Address: Upon information and belief, the individual can be contacted through the Saudi Binladin Group, Prince Abdullah Street, P.O. Box 122962, 21332, Jeddah Saudi Arabia.

Subject: Id.

#### 6. Ghalib bin Laden

Address: Upon information and belief, the individual can be contacted through the Saudi Binladin Group, Prince Abdullah Street, P.O. Box 122962, 21332, Jeddah Saudi Arabia.

Subject: Id.

# 7. Haidar Mohammed bin Laden

Address: Upon information and belief, the individual can be contacted through the Saudi Binladin Group, Prince Abdullah Street, P.O. Box 122962, 21332, Jeddah Saudi Arabia.

#### 8. Enaam M. Arnanout

Address: Upon information and belief, the individual is incarcerated in the United States and can be contacted through the Department of Justice and/or the Federal Bureau of Prisons.

Subject: Id.

#### 9. Mohammed Loay Bayazid

Address: Unknown

Subject: Id.

#### 10. Arafat El Asahi

Address: Unknown

Subject: Id.

#### Wa'el Hamza Jelaidan 11.

Address: Unknown

Subject: Id.

#### 12. Ihab Ali

Address: Unknown

Subject: Id.

#### 13. Wadih El Hage

Address: Upon information and belief, the individual is incarcerated in the United States and can be contacted through the Department of Justice and/or the Federal Bureau of Prisons.

Subject: Id.

#### 14. Adel Muhammad Sadi bin Kazam

Address: Unknown

Subject: Id.

#### 15. Abdullah bin Saleh al Obaid

Address: Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Id.

#### 16. Abd al Hamid Sulaiman al Mujil

Address: Unknown

Subject: Id.

#### 17. Muhammad Sa'd Darwish al Shazy

Address: Unknown

# 18. Sayed Abu Nesir

Address: Unknown

Subject: Id.

# 19. Shaykh Ahmed al Gamdin

Address: Unknown

Subject: Id.

### 20. Abdel Aziz Zaher

Address: Unknown

Subject: Id.

### 21. Jamal al Jibouri

Address: Unknown

Subject: Id.

# 22. Mahmoud Jaballah

Address: Unknown

Subject: Id.

# 23. Nazir Qureshi

Address: Unknown

Subject: Id.

# 24. Mohammed Ayyub Thukar

Address: Unknown

Subject: Id.

# 25. Gulbadin Hekmatyar

Address: Unknown

Subject: Id.

# 26. Ahmed Ajaj

Address: Unknown

Subject: Id.

# 27. Abdullah Bin Laden

Address: Upon information and belief, the individual can be contacted through the Saudi Binladin Group, Prince Abdullah Street, P.O. Box 122962, 21332,

Jeddah Saudi Arabia.

Subject: Id.

#### 28. Omar bin Laden

Address: Upon information and belief, the individual can be contacted through the Saudi Binladin Group, Prince Abdullah Street, P.O. Box 122962, 21332,

Jeddah Saudi Arabia.

# 29. Shahir A. Batterjee

Address: Unknown

Subject: Id.

# 30. Saleh al Hussayen

Address: Unknown

Subject: Id.

# 31. Abdul Rahman al Swailem

Address: Unknown

Subject: Id.

### 32. Abdullah Muhsen al Turki

Address: Unknown

Subject: Id.

### 33. Abdullah Omar Naseef

Address: Unknown

Subject: Id.

# 34. Sami Omar al Hussayen

Address: Unknown

Subject: Id.

### 35. Adnan Basha

Address: Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W.,

Suite 900, Washington, D.C. 20036.

Subject: Id.

### 36. Perouz Sedaghaty

Address: Upon information and belief, the individual is incarcerated in the United States and can be contacted through the attorneys at Bernabei & Wachtel, 1775 T Street, N.W., Washington, D.C. 20009.

Subject: Id.

#### 37. Soliman al Buthe

Address: Upon information and belief, the individual can be contacted through the attorneys at Bernabei & Wachtel, 1775 T Street, N.W., Washington, D.C. 20009.

Subject: Id.

# 38. Aqeel Abdulaziz al Aqil

Address: Unknown

39. Mansour al Kadi

Address: Unknown

Subject: Id.

40. Sheikh Muhmad al Tujri

Address: Unknown

Subject: Id.

41. Omar al Faruq

Address: Unknown

Subject: Id.

42. Ayman al Zawahiri

Address: Unknown

Subject: Id.

43. Abu Rida

Address: Unknown

Subject: Id.

44. Boumediene Lakhdar

Address: Unknown

Subject: Id.

45. Nechle Mohammed

Address: Unknown

Subject: Id.

46. Yassin al Kadi

Address: Unknown

Subject: Id.

47. Abdulrahman bin Mahfouz

Address: Unknown

Subject: Id.

48. Suleiman al Rajhi

Address: Unknown

Subject: Id.

49. Abdullah al Rajhi

Address: Unknown

Subject: Id.

50. Saleh Abdulaziz al Rajhi

Address: Unknown

# 51. Ahmed Totonji

Address: Upon information and belief, the individual can be contacted through the attorneys at Luque Marino, 910 17<sup>th</sup> Street, N.W., Suite 800, Washington, D.C. 20006, and Law Office of Steven Barentzen, 1575 Eye Street, N.W., Suite 300, Washington, D.C. 20005.

Subject: Id.

# 52. Mohammed Jaghlit

<u>Address</u>: Upon information and belief, the individual resides in the United States. <u>Subject</u>: *Id*.

# 53. M. Omar Ashraf

Address: Upon information and belief, the individual can be contacted through the attorneys at Luque Marino, 910 17<sup>th</sup> Street, N.W., Suite 800, Washington, D.C. 20006, and Law Office of Steven Barentzen, 1575 Eye Street, N.W., Suite 300, Washington, D.C. 20005.

Subject: Id.

### 54. Muhammed Ashraf

Address: Upon information and belief, the individual can be contacted through the attorneys at Luque Marino, 910 17<sup>th</sup> Street, N.W., Suite 800, Washington, D.C. 20006, and Law Office of Steven Barentzen, 1575 Eye Street, N.W., Suite 300, Washington, D.C. 20005.

Subject: Id.

# 55. Iqbal Yunus

Address: Upon information and belief, the individual can be contacted through the attorneys at Luque Marino, 910 17<sup>th</sup> Street, N.W., Suite 800, Washington, D.C. 20006, and Law Office of Steven Barentzen, 1575 Eye Street, N.W., Suite 300, Washington, D.C. 20005.

Subject: Id.

### 56. M. Yaqub Mirza

<u>Address</u>: Upon information and belief, the individual can be contacted through the attorneys at Luque Marino, 910 17<sup>th</sup> Street, N.W., Suite 800, Washington, D.C. 20006, and Law Office of Steven Barentzen, 1575 Eye Street, N.W., Suite 300, Washington, D.C. 20005.

Subject: Id.

# 57. Jamal Barzinji

<u>Address</u>: Upon information and belief, the individual can be contacted through the attorneys at Luque Marino, 910 17<sup>th</sup> Street, N.W., Suite 800, Washington, D.C. 20006, and Law Office of Steven Barentzen, 1575 Eye Street, N.W., Suite 300, Washington, D.C. 20005.

58. Akberali Mohammed Ali Moawalla

Address: Unknown

Subject: Id.

59. Mohammed Nour Rahimi

Address: Unknown

Subject: Id.

60. Khalaf Ahmad Ashour

Address: Unknown

Subject: Id.

61. Malik M. Sharif

Address: Unknown

Subject: Id.

62. Khaled S. al Dawood

Address: Unknown

Subject: Id.

63. Abdul Rahman Nematallah

Address: Unknown

Subject: Id.

64. Muhamad Salem Ali Yaf'ei

Address: Unknown

Subject: Id.

C. All individuals identified in all other pleadings and submissions in this MDL (i.e., RICO Statements, More Definite Statements, etc.). Individuals include, but are not limited to:

1. Dr. Maneh al Jahari

Address: Unknown

<u>Subject</u>: Individual has information regarding a number of subject matters relative to Plaintiffs' claims, including without limitation: (i) the origins of al Qaeda; (ii) the financial and logistical infrastructure created to support al Qaeda; (iii) al Qaeda's funding, including support from purported Islamic charitable organizations, Islamic financial institutions, and foreign states such as Saudi Arabia; (iv) al Qaeda's-related terrorist attacks or plots; (v) al Qaeda's expansion and participation in other regional jihad campaigns; and (vi) al Qaeda's association with related terrorist organizations.

2. Amir Khattab

Address: Unknown

3. Farooq Ahmed Address: Unknown

Subject: Id.

4. Mohammed Maqbool

Address: Unknown

Subject: Id.

Ali Ahmed Ali Hamad

Address: Unknown

Subject: Id.

5.

6. Abdul Hadi al Gahtani

Address: Unknown

Subject: Id.

7. Ahmed Zuhair Handala

Address: Unknown

Subject: Id.

8. Dr. Abu Hazifa

Address: Unknown

Subject: Id.

9. Muhammed Ali Sayed

Address: Unknown

Subject: Id.

10. Bashir Barbar Qadim

Address: Unknown

Subject: Id.

11. Adel Muhammad Sadi Bin Kazarn

Address: Unknown

Subject: Id.

12. M. Claude Nicati

Address: Unknown

Subject: Id.

13. Philip C. Wilcox, Jr.

<u>Address</u>: Upon information and belief, the individual can be contacted through the Foundation for Middle East Peace, 1761 N Street, N.W., Washington, D.C.

20036.

14. Ayman Awad

Address: Unknown

Subject: Id.

15. Mohamed al Ali al Qari bin Eid

Address: Unknown

Subject: Id.

16. Dr. Abdul Latif Saleh

Address: Unknown

Subject: Id.

17. Amir Mehdi

Address: Unknown

Subject: Id.

18. Jamal al Fadl

Address: Unknown

Subject: Id.

19. Abdelaziz Zaher

Address: Unknown

Subject: Id.

20. Jamal al Jibouri

Address: Unknown

Subject: Id.

D. All individuals identified on the U.S. Department of the Treasury Office of Foreign Assets Control's Specially Designated Nationals and Blocked Persons list, including without limitation, all individuals designated as Specially Designated Global Terrorists ("SDGT") pursuant to E.O. 13224. Individuals include, but are not limited to:

1. Osama bin Laden

Address: Unknown

<u>Subject</u>: Individual has information regarding a number of subject matters relative to Plaintiffs' claims, including without limitation: (i) the origins of al Qaeda; (ii) the financial and logistical infrastructure created to support al Qaeda; (iii) al Qaeda's funding, including support from purported Islamic charitable organizations, Islamic financial institutions, and foreign states such as Saudi Arabia; (iv) al Qaeda's-related terrorist attacks or plots; (v) al Qaeda's expansion and participation in other regional jihad campaigns; and (vi) al Qaeda's association with related terrorist organizations.

2. Khalid Sheikh Mohammed

Address: United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba.

3. Abu Zubaydah

Address: United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba.

Subject: Id.

4. Wa'el Hamza Jelaidan

Address: Unknown

Subject: Id.

5. Yassin al Kadi

Address: Unknown

Subject: Id.

6. Abd al Hamid Sulaiman al Mujil

Address: Unknown

Subject: Id.

7. Ageel Abdulaziz al Agil

Address: Unknown

Subject: Id.

8. Soliman al Buthe

Address: Upon information and belief, the individual can be contacted through the attorneys at Bernabei & Wachtel, 1775 T Street, N.W., Washington, D.C.

20009.

Subject: Id.

9. Muhammad Atif

Address: Unknown

Subject: Id.

10. Sayf al Adl

Address: Unknown

Subject: Id.

11. Abu Hafs the Mauritanian

Address: Unknown

Subject: Id.

12. Ibn al Shaykh al Libi

Address: Unknown

Subject: Id.

13. Abd al Hadi al Iraqi

Address: Unknown

14. Ayman al Zawahiri

Address: Unknown

Subject: Id.

15. Thirwat Salah Shihata

Address: Unknown

Subject: Id.

16. Tariq Anwar al Sayyid Ahmad

Address: Unknown

Subject: Id.

17. Muhammad Salah

Address: Unknown

Subject: Id.

18. Nurjaman Riduan Ismuddin

Address: United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba.

Subject: Id.

19. Mohammed Iqbal Abdurrahman

Address: Unknown

Subject: Id.

20. Mounir El Motassadeq

Address: Unknown

Subject: Id.

21. Ramzi Binalshibh

Address: United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba.

Subject: Id.

22. Zakarya Essabar

Address: Unknown

Subject: Id.

23. Said Bahaji

Address: Unknown

Subject: Id.

24. Adel Ben Soltane

Address: Unknown

Subject: Id.

25. Nabil Benattia

Address: Unknown

26. Yassine Chekkouri

<u>Address</u>: Unknown

<u>Subject</u>: *Id*.

27. Riadh Jelassi

Address: Unknown

Subject: Id.

28. Mendi Kammoun

Address: Unknown

Subject: Id.

29. Samir Kishk

Address: Unknown

Subject: Id.

30. Tarek Ben Habib Maaroufi

Address: Unknown

Subject: Id.

31. Abdelhalim Remadna

Address: Unknown

Subject: Id.

32. Mansour Thaer

Address: Unknown

Subject: Id.

33. Lazhar Ben Mohammed Tlili

Address: Unknown

Subject: Id.

34. Habib Waddani

Address: Unknown

Subject: Id.

35. Ahmed Idris Nasreddin

Address: Unknown

Subject: Id.

36. Youssef Nada

Address: Unknown

Subject: Id.

37. Abdelkadir Mahmoud Es Sayed

Address: Unknown

38. Khalid al Fawaz Address: Unknown

Subject: Id.

39. Abu Hamza al Masri <u>Address</u>: Unknown

Subject: Id.

40. Mohamed Ben Belgacem Aouadi

Address: Unknown

Subject: Id.

41. Mokhtar Boughougha

Address: Unknown

Subject: Id.

42. Tarek Charaabi

Address: Unknown

Subject: Id.

43. Sami Ben Khemais Essid

Address: Unknown

Subject: Id.

44. Lased Ben Heni

Address: Unknown

Subject: Id.

45. Bashir Ud Din Mahmood

Address: Unknown

Subject: Id.

46. Abdul Majeed

Address: Unknown

Subject: Id.

47. S.M. Tufail

Address: Unknown

Subject: Id.

48. Youssef M. Nada

Address: Unknown

Subject: Id.

49. Hussein Mahmud Abdullkadir

Address: Unknown

50. Abdirasik Aden

<u>Address</u>: Unknown

Subject: *Id*.

51. Abbas Abdi Ali
<u>Address</u>: Unknown
<u>Subject</u>: *Id*.

52. Abdi Adulaziz Ali
<u>Address</u>: Unknown
Subject: *Id*.

53. Yusaf Ahmed Ali
<u>Address</u>: Unknown
<u>Subject</u>: *Id*.

54. Ali Ghaleb Himmat Address: Unknown Subject: *Id.* 

55. Albert Fredrich Armand Huber Address: Unknown Subject: *Id.* 

56. Liban Hussein

Address: Unknown
Subject: Id.

57. Abdullahi Hussein Kahie Address: Unknown Subject: *Id.* 

58. Mohammed Mansour Address: Unknown Subject: *Id.* 

59. Zeinab Mansour-Fattah
Address: Unknown
Subject: Id.

60. Abdullah Ahmed Abdullah

<u>Address</u>: Unknown

<u>Subject</u>: *Id*.

61. Haji Abdul Manan Agha
Address: Unknown
Subject: Id.

62. Muhammad al Hamati
Address: Unknown
Subject: *Id*.

63. Amin al Haq
Address: Unknown
Subject: Id.

64. Saqar al Sadawi
Address: Unknown
Subject: Id.

65. Ahmad Sa'Id Al-Kadr

<u>Address</u>: Unknown

<u>Subject</u>: *Id*.

66. Anas al Liby

<u>Address</u>: Unknown

<u>Subject</u>: *Id*.

67. Ahmad Ibrahim al Mughassil
Address: Unknown
Subject: Id.

68. Abdelkarim Hussein Mohamed al Nasser

<u>Address</u>: Unknown

<u>Subject</u>: *Id*.

69. Sa'D al Sharif

Address: Unknown
Subject: Id.

70. Ibrahim Salih Mohammed al Yacoub Address: Unknown Subject: *Id*.

71. Ahmed Mohammed Hamed Ali
Address: Unknown
Subject: Id.

72. Ali Atwa

<u>Address</u>: Unknown

<u>Subject</u>: *Id*.

73. Bilal bin Marwan

Address: Unknown
Subject: Id.

## 74. Chafiq Bin Muhammad Ayadi

Address: Unknown

Subject: Id.

## 75. Mamoun Darkazanli

Address: Unknown

Subject: Id.

#### 76. Ali Saed Bin Ali El Hoorie

Address: Unknown

Subject: Id.

## 77. Mustafa Mohamed Fadhil

Address: Unknown

Subject: Id.

## 78. Ahmed Khalfan Ghailani

Address: Upon information and belief, the individual is incarcerated in the United States and can be contacted through the Department of Justice and/or the

Federal Bureau of Prisons.

Subject: Id.

## 79. Riad Hijazi

Address: Unknown

Subject: Id.

#### 80. Hasan Izz al Din

Address: Unknown

Subject: Id.

## 81. Mufti Rashid Ahmad Ladehyanoy

Address: Unknown

Subject: Id.

#### 82. Fazul Abdullah Mohammed

Address: Unknown

Subject: Id.

## 83. Fahid Mohammed Ally Msalam

Address: Unknown

Subject: Id.

#### 84. Youssef Abdaoui

Address: Unknown

85. Mohammed Amine Akli Address: Unknown

Subject: Id.

86. Mohrez Amdouni Address: Unknown Subject: Id.

87. Chiheb Ben Mohamed Ayari

Address: Unknown

Subject: Id.

88. Mondher Baazaoui Address: Unknown Subject: Id.

89. Lionel Dumont Address: Unknown Subject: Id.

90. Moussa Ben Amor Essaadi

Address: Unknown

Subject: Id.

91. Rachid Fehar

Address: Unknown

Subject: Id.

92. Brahim Ben Hedili Hamami

Address: Unknown

Subject: Id.

93. Khalil Jarraya

Address: Unknown

Subject: Id.

94. Mounir Ben Habib Jerraya

Address: Unknown

Subject: Id.

95. Fouzi Jendoubi

Address: Unknown

Subject: Id.

96. Fethi Ben Rebai Masri

Address: Unknown

97. Najib Ouaz

Address: Unknown

Subject: Id.

98. Ahmed Hasni Rarrbo

Address: Unknown

Subject: Id.

99. Nedal Saleh

Address: Unknown

Subject: Id.

100. Abdelghani Mzoudi

Address: Unknown

Subject: Id.

101. Gulbuddin Hekmatyar

Address: Unknown

Subject: Id.

102. Imad Mughniyeh

Address: Unknown

Subject: Id.

103. Muhammad Omar

Address: Unknown

Subject: Id.

E. Current or former U.S. Government officials participating or involved in the E.O. 13224 designation process. Individuals include, but are not limited to:

1. Stuart A. Levey

Address: Upon information and belief, the individual resides in the United States

and can be contacted through the Department of the Treasury.

<u>Subject</u>: Individual has information regarding a number of subject matters relative to Plaintiffs' claims, including without limitation: (i) the origins of al Qaeda; (ii) the financial and logistical infrastructure created to support al Qaeda; (iii) al Qaeda's funding, including support from purported Islamic charitable organizations, Islamic financial institutions, and foreign states such as Saudi Arabia; (iv) al Qaeda's-related terrorist attacks or plots; (v) al Qaeda's expansion and participation in other regional jihad campaigns; and (vi) al Qaeda's association with related terrorist organizations.

2. R. Richard Newcomb

Address: Upon information and belief, the individual can be contacted through

DLA Piper, 500 Eighth Street, N.W., Washington D.C. 20004.

#### 3. Mark D. Roberts

<u>Address</u>: Upon information and belief, the individual resides in the United States and can be contacted through the Department of the Treasury.

Subject: Id.

## 4. Barbara C. Hammerle

<u>Address</u>: Upon information and belief, the individual resides in the United States and can be contacted through the Department of the Treasury.

Subject: Id.

#### 5. Matthew A. Levitt

Address: Upon information and belief, the individual can be contacted through the Washington Institute for Near East Policy, 1828 L Street N.W., Suite 1050 Washington D.C. 20036.

Subject: Id.

## 6. David D. Aufhauser

Address: Upon information and belief, the individual can be contacted through Williams & Connolly, 725 Twelfth Street, N.W., Washington, D.C. 20005. Subject: *Id.* 

F. Members, staffers, investigators, and other individuals associated with the United Nations Security Council's al Qaida and Taliban Sanctions Committee, established pursuant to Resolution 1267, including without limitation, all individuals who were interviewed by the United National Committee and/or who provided sworn testimony or statements to the United National Committee. Individuals include, but are not limited to:

## 1. Thomas Mayr Harting

Address: Upon information and belief, the individuals associated with the United Nations Security Council's al Qaida and Taliban Sanctions Committee can be contacted through the United Nations Headquarters at 760 United Nations Plaza, New York, New York 10017. Additionally, individuals may be contacted through the Secretariat of the Committee via email at SC-1267-Committee@un.org, as well as through the Committee's Monitoring Team at 1267mt@un.org.

Subject: Individual has information regarding a number of subject matters relative to Plaintiffs' claims, including without limitation: (i) the origins of al Qaeda; (ii) the financial and logistical infrastructure created to support al Qaeda; (iii) al Qaeda's funding, including support from purported Islamic charitable organizations, Islamic financial institutions, and foreign states such as Saudi Arabia; (iv) al Qaeda's-related terrorist attacks or plots; (v) al Qaeda's expansion and participation in other regional jihad campaigns; and (vi) al Qaeda's association with related terrorist organizations.

#### 2. Richard Barrett

Address: Upon information and belief, the individuals associated with the United Nations Security Council's al Qaida and Taliban Sanctions Committee can be contacted through the United Nations Headquarters at 760 United Nations Plaza,

New York, New York 10017. Additionally, individuals may be contacted through the Secretariat of the Committee via email at SC-1267-Committee@un.org, as well as through the Committee's Monitoring Team at 1267mt@un.org. Subject: *Id*.

## 3. Heraldo Munoz

Address: Upon information and belief, the individuals associated with the United Nations Security Council's al Qaida and Taliban Sanctions Committee can be contacted through the United Nations Headquarters at 760 United Nations Plaza, New York, New York 10017. Additionally, individuals may be contacted through the Secretariat of the Committee via email at <a href="SC-1267-Committee@un.org">SC-1267-Committee@un.org</a>, as well as through the Committee's Monitoring Team at 1267mt@un.org. <a href="Subject: Id.">Subject: Id.</a>

#### 4. Alfonso Valdivieso

Address: Upon information and belief, the individuals associated with the United Nations Security Council's al Qaida and Taliban Sanctions Committee can be contacted through the United Nations Headquarters at 760 United Nations Plaza, New York, New York 10017. Additionally, individuals may be contacted through the Secretariat of the Committee via email at <a href="SC-1267-Committee@un.org">SC-1267-Committee@un.org</a>, as well as through the Committee's Monitoring Team at 1267mt@un.org. Subject: *Id*.

#### 5. Michael Chander

Address: Upon information and belief, the individuals associated with the United Nations Security Council's al Qaida and Taliban Sanctions Committee can be contacted through the United Nations Headquarters at 760 United Nations Plaza, New York, New York 10017. Additionally, individuals may be contacted through the Secretariat of the Committee via email at <a href="SC-1267-Committee@un.org">SC-1267-Committee@un.org</a>, as well as through the Committee's Monitoring Team at 1267mt@un.org. <a href="Subject: Id.">Subject: Id.</a>

## 6. Philippe Graver

Address: Upon information and belief, the individuals associated with the United Nations Security Council's al Qaida and Taliban Sanctions Committee can be contacted through the United Nations Headquarters at 760 United Nations Plaza, New York, New York 10017. Additionally, individuals may be contacted through the Secretariat of the Committee via email at <a href="mailto:SC-1267-Committee@un.org">SC-1267-Committee@un.org</a>, as well as through the Committee's Monitoring Team at 1267mt@un.org. <a href="mailto:Subject: Id.">Subject: Id.</a>

#### 7. Hassan H. Ali Abaza

Address: Upon information and belief, the individuals associated with the United Nations Security Council's al Qaida and Taliban Sanctions Committee can be contacted through the United Nations Headquarters at 760 United Nations Plaza, New York, New York 10017. Additionally, individuals may be contacted through the Secretariat of the Committee via email at SC-1267-Committee@un.org, as

well as through the Committee's Monitoring Team at 1267mt@un.org. Subject: *Id*.

# 8. Surendra Bahadur Shah

Address: Upon information and belief, the individuals associated with the United Nations Security Council's al Qaida and Taliban Sanctions Committee can be contacted through the United Nations Headquarters at 760 United Nations Plaza, New York, New York 10017. Additionally, individuals may be contacted through the Secretariat of the Committee via email at SC-1267-Committee@un.org, as well as through the Committee's Monitoring Team at 1267mt@un.org. Subject: Id.

# 9. Michael D. Langan

Address: Upon information and belief, the individuals associated with the United Nations Security Council's al Qaida and Taliban Sanctions Committee can be contacted through the United Nations Headquarters at 760 United Nations Plaza, New York, New York 10017. Additionally, individuals may be contacted through the Secretariat of the Committee via email at <a href="mailto:SC-1267-Committee@un.org">SC-1267-Committee@un.org</a>, as well as through the Committee's Monitoring Team at 1267mt@un.org. <a href="mailto:Subject">Subject</a>: Id.

## 10. Haile Menkerios

Address: Upon information and belief, the individuals associated with the United Nations Security Council's al Qaida and Taliban Sanctions Committee can be contacted through the United Nations Headquarters at 760 United Nations Plaza, New York, New York 10017. Additionally, individuals may be contacted through the Secretariat of the Committee via email at <a href="SC-1267-Committee@un.org">SC-1267-Committee@un.org</a>, as well as through the Committee's Monitoring Team at 1267mt@un.org. <a href="Subject: Id">Subject: Id</a>.

## 11. Reynaldo O. Arcilla

Address: Upon information and belief, the individuals associated with the United Nations Security Council's al Qaida and Taliban Sanctions Committee can be contacted through the United Nations Headquarters at 760 United Nations Plaza, New York, New York 10017. Additionally, individuals may be contacted through the Secretariat of the Committee via email at SC-1267-Committee@un.org, as well as through the Committee's Monitoring Team at 1267mt@un.org. Subject: *Id.* 

#### 12. Michael E. G. Chandler

Address: Upon information and belief, the individuals associated with the United Nations Security Council's al Qaida and Taliban Sanctions Committee can be contacted through the United Nations Headquarters at 760 United Nations Plaza, New York, New York 10017. Additionally, individuals may be contacted through the Secretariat of the Committee via email at SC-1267-Committee@un.org, as well as through the Committee's Monitoring Team at 1267mt@un.org. Subject: Id.

#### 13. Mahmoud Kassem

Address: Upon information and belief, the individuals associated with the United Nations Security Council's al Qaida and Taliban Sanctions Committee can be contacted through the United Nations Headquarters at 760 United Nations Plaza, New York, New York 10017. Additionally, individuals may be contacted through the Secretariat of the Committee via email at <a href="SC-1267-Committee@un.org">SC-1267-Committee@un.org</a>, as well as through the Committee's Monitoring Team at 1267mt@un.org. Subject: *Id*.

## 14. Atilio N. Molteni

Address: Upon information and belief, the individuals associated with the United Nations Security Council's al Qaida and Taliban Sanctions Committee can be contacted through the United Nations Headquarters at 760 United Nations Plaza, New York, New York 10017. Additionally, individuals may be contacted through the Secretariat of the Committee via email at <a href="SC-1267-Committee@un.org">SC-1267-Committee@un.org</a>, as well as through the Committee's Monitoring Team at 1267mt@un.org. Subject: *Id.* 

- G. All current or former members and/or associates of the <u>al Qaeda</u> terrorist organization. Individuals include, but are not limited to:
  - 1. Osama bin Laden

Address: Unknown

Subject: Individual has information regarding a number of subject matters relative to Plaintiffs' claims, including without limitation: (i) the origins of al Qaeda; (ii) the financial and logistical infrastructure created to support al Qaeda; (iii) al Qaeda's funding, including support from purported Islamic charitable organizations, Islamic financial institutions, and foreign states such as Saudi Arabia; (iv) al Qaeda's-related terrorist attacks or plots; (v) al Qaeda's expansion and participation in other regional jihad campaigns; and (vi) al Qaeda's association with related terrorist organizations.

2. Ayman al Zawahiri

Address: Unknown

Subject: Id.

3. Khalid Sheikh Mohammed

Address: United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba.

Subject: Id.

4. Abu Zubaydah

Address: United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba.

Subject: Id.

5. Ramzi Binalshibh

Address: United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba.

6. Wa'el Hamza Jelaidan

Address: Unknown

Subject: Id.

H. All current or former members and/or associates of the <u>Abu Sayyaf Group</u> terrorist organization. Individuals include, but are not limited to:

1. Madhatta Asagal Haipe

Address: Unknown

<u>Subject</u>: Individual has information regarding a number of subject matters relative to Plaintiffs' claims, including without limitation: (i) the origins of al Qaeda; (ii) the financial and logistical infrastructure created to support al Qaeda; (iii) al Qaeda's funding, including support from purported Islamic charitable organizations, Islamic financial institutions, and foreign states such as Saudi Arabia; (iv) al Qaeda's-related terrorist attacks or plots; (v) al Qaeda's expansion and participation in other regional jihad campaigns; and (vi) al Qaeda's association with related terrorist organizations.

2. Gumbahali Jumdail

Address: Unknown

Subject: Id.

3. Jhon Buhari Jamiri

Address: Unknown

Subject: Id.

4. Adjik Halik

Address: Unknown

Subject: Id.

5. Jainal Antel Sali, Jr.

Address: Unknown

Subject: Id.

6. Radulan Sahiron

Address: Unknown

Subject: Id.

7. Isnilon Totoni Hapilon

Address: Unknown

Subject: Id.

8. Noor Umog

Address: Unknown

9. Mohammad Saleh

Address: Unknown

Subject: Id.

10. Abdullah Nasser Alarifi

Address: Unknown

Subject: Id.

11. Abdulraheem Hamad al Talhi

Address: Uknown

Subject: Id.

12. Burhan Mundos

Address: Unknown

Subject: Id.

13. Mahmoud Afif

Address: Unknown

Subject: Id.

14. Khair Mundos

Address: Unknown

Subject: Id.

I. All current or former members and/or associates of the <u>Jemaah Islamiyah</u> terrorist organization. Individuals include, but are not limited to:

1. Yassin Sywal

Address: Unknown

Subject: Individual has information regarding a number of subject matters relative to Plaintiffs' claims, including without limitation: (i) the origins of al Qaeda; (ii) the financial and logistical infrastructure created to support al Qaeda; (iii) al Qaeda's funding, including support from purported Islamic charitable organizations, Islamic financial institutions, and foreign states such as Saudi Arabia; (iv) al Qaeda's-related terrorist attacks or plots; (v) al Qaeda's expansion and participation in other regional jihad campaigns; and (vi) al Qaeda's association with related terrorist organizations.

2. Mukhlis Yunos

Address: Unknown

Subject: Id.

3. Imam Samudra

Address: Unknown

4. Huda bin Abdul Haq
Address: Unknown
Subject: Id.

5. Parlindungan Siregar
Address: Unknown
Subject: Id.

6. Julkipli Salim Y Salamuddin Address: Unknown Subject: *Id.* 

7. Aris Munandar

<u>Address</u>: Unknown

<u>Subject</u>: *Id*.

8. Fathur Rohman al Ghozi
Address: Unknown
Subject: *Id.* 

9. Agus Dwikarna
<u>Address</u>: Unknown
<u>Subject</u>: *Id*.

10. Abdul Hakim Murad Address: Unknown Subject: *Id.* 

11. Abu Rusdan

<u>Address</u>: Unknown

<u>Subject</u>: *Id*.

12. Zulkarnaen

<u>Address</u>: Unknown

<u>Subject</u>: *Id*.

13. Joko Pitono

<u>Address</u>: Unknown

<u>Subject</u>: *Id*.

14. Abu Bakar Ba'asyir
Address: Unknown
Subject: *Id*.

15. Gun Gun Rusman Gunawan Address: Unknown Subject: *Id*.

16. Taufik Rifki

Address: Unknown

Subject: Id.

17. Abdullah Anshori

Address: Unknown

Subject: Id.

18. Nurjaman Riduan Isamuddin

Address: Unknown

Subject: Id.

19. Mohamad Iqbal Abdurrahman

Address: Unknown

Subject: Id.

- J. All current or former members and/or associates of the <u>al Gama'a al Islamiyya</u> terrorist organization. Individuals include, but are not limited to:
  - 1. Sheikh Omar Abdel Rahman

Address: Unknown

<u>Subject</u>: Individual has information regarding a number of subject matters relative to Plaintiffs' claims, including without limitation: (i) the origins of al Qaeda; (ii) the financial and logistical infrastructure created to support al Qaeda; (iii) al Qaeda's funding, including support from purported Islamic charitable organizations, Islamic financial institutions, and foreign states such as Saudi Arabia; (iv) al Qaeda's-related terrorist attacks or plots; (v) al Qaeda's expansion and participation in other regional jihad campaigns; and (vi) al Qaeda's association with related terrorist organizations.

2. Najeh Ibrahim

Address: Unknown

Subject: Id.

3. Mohammad Hasan Khalil al Hakim

Address: Unknown

Subject: Id.

Sheikh Abdel Akhar Hammad

Address: Unknown

Subject: Id.

5. Taha Musa

Address: Unknown

Subject: Id.

K. All current or former members and/or associates of the <u>Egyptian Islamic Jihad</u> terrorist organization. Individuals include, but are not limited to:

1. Ayman al Zawahiri

Address: Unknown

<u>Subject</u>: Individual has information regarding a number of subject matters relative to Plaintiffs' claims, including without limitation: (i) the origins of al Qaeda; (ii) the financial and logistical infrastructure created to support al Qaeda; (iii) al Qaeda's funding, including support from purported Islamic charitable organizations, Islamic financial institutions, and foreign states such as Saudi Arabia; (iv) al Qaeda's-related terrorist attacks or plots; (v) al Qaeda's expansion and participation in other regional jihad campaigns; and (vi) al Qaeda's association with related terrorist organizations.

2. Sayyed Imam al Sharif

Address: Unknown

Subject: Id.

3. Hani al Sibai

Address: Unknown

Subject: Id.

4. Ali Abdul Saoud Mohamed

Address: Unknown

Subject: Id.

- L. All current or former members and/or associates of the Moro Islamic Liberation Front terrorist organization. Individuals include, but are not limited to:
  - 1. Mohagher Iqbal

Address: Unknown

<u>Subject</u>: Individual has information regarding a number of subject matters relative to Plaintiffs' claims, including without limitation: (i) the origins of al Qaeda; (ii) the financial and logistical infrastructure created to support al Qaeda; (iii) al Qaeda's funding, including support from purported Islamic charitable organizations, Islamic financial institutions, and foreign states such as Saudi Arabia; (iv) al Qaeda's-related terrorist attacks or plots; (v) al Qaeda's expansion and participation in other regional jihad campaigns; and (vi) al Qaeda's association with related terrorist organizations.

2. Mukhlis Yunos

Address: Unknown

Subject: Id.

- M. All current or former members and/or associates of the <u>Asbat al Ansar</u> terrorist organization. Individuals include, but are not limited to:
  - 1. Ahmed al Karim al Saadi

Address: Unknown

Subject: Individual has information regarding a number of subject matters relative to Plaintiffs' claims, including without limitation: (i) the origins of al

Qaeda; (ii) the financial and logistical infrastructure created to support al Qaeda; (iii) al Qaeda's funding, including support from purported Islamic charitable organizations, Islamic financial institutions, and foreign states such as Saudi Arabia; (iv) al Qaeda's-related terrorist attacks or plots; (v) al Qaeda's expansion and participation in other regional jihad campaigns; and (vi) al Qaeda's association with related terrorist organizations.

2. Haytham Abd al Karim al Saadi

Address: Unknown

Subject: Id.

3. Sulayman Khalid Darwish

Address: Unknown

Subject: Id.

4. Mahir al Sa'di

Address: Unknown

Subject: Id.

- N. All current or former members and/or associates of the <u>Hezbollah</u> terrorist organization. Individuals include, but are not limited to:
  - 1. Ali Mussa Daqduq

Address: Unknown

<u>Subject</u>: Individual has information regarding a number of subject matters relative to Plaintiffs' claims, including without limitation: (i) the origins of al Qaeda; (ii) the financial and logistical infrastructure created to support al Qaeda; (iii) al Qaeda's funding, including support from purported Islamic charitable organizations, Islamic financial institutions, and foreign states such as Saudi Arabia; (iv) al Qaeda's-related terrorist attacks or plots; (v) al Qaeda's expansion and participation in other regional jihad campaigns; and (vi) al Qaeda's association with related terrorist organizations.

2. Sheikh Naim Oassem

Address: Unknown

Subject: Id.

3. Ali Atwa

Address: Unknown

Subject: Id.

4. Hasan Izz al Din

Address: Unknown

Subject: Id.

5. Mohammed Hussein al Husseini

Address: Unknown

6. Ibrahim Mousawi

Address: Unknown

Subject: Id.

7. Hussein Naboulsi

Address: Unknown

Subject: Id.

- O. All current or former members and/or associates of the HAMAS terrorist organization. Individuals include, but are not limited to:
  - 1. Sheikh Ahmed Yassin

Address: Unknown

Subject: Individual has information regarding a number of subject matters relative to Plaintiffs' claims, including without limitation: (i) the origins of al Qaeda; (ii) the financial and logistical infrastructure created to support al Qaeda; (iii) al Qaeda's funding, including support from purported Islamic charitable organizations, Islamic financial institutions, and foreign states such as Saudi Arabia; (iv) al Qaeda's-related terrorist attacks or plots; (v) al Qaeda's expansion and participation in other regional jihad campaigns; and (vi) al Qaeda's association with related terrorist organizations.

2. Imad Khalil al Alami

Address: Unknown

Subject: Id.

3. Usama Hamdan

Address: Unknown

Subject: Id.

4. Khalid Mishaal

Address: Unknown

Subject: Id.

5. Musa Abu Marzook

Address: Unknown

Subject: Id.

6. Andel Aziz Rantisi

Address: Unknown

Subject: Id.

- P. All current or former members and/or associates of the Palestinian Islamic Jihad terrorist organization. Individuals include, but are not limited to:
  - 1. Ramadan Abdallah Shallah

Address: Unknown

Subject: Individual has information regarding a number of subject matters

relative to Plaintiffs' claims, including without limitation: (i) the origins of al Qaeda; (ii) the financial and logistical infrastructure created to support al Qaeda; (iii) al Qaeda's funding, including support from purported Islamic charitable organizations, Islamic financial institutions, and foreign states such as Saudi Arabia; (iv) al Qaeda's-related terrorist attacks or plots; (v) al Qaeda's expansion and participation in other regional jihad campaigns; and (vi) al Qaeda's association with related terrorist organizations.

2. Sami Amin al Arian

Address: Unknown

Subject: Id.

3. Ramadan Abdullah Shallah

Address: Unknown

Subject: Id.

4. Bashir Musa Mohammed Nafi

Address: Unknown

Subject: Id.

5. Sameeh Hammoudeh

Address: Unknown

Subject: Id.

6.

Muhammed Tasir Hassan al Khatib

Address: Unknown

Subject: Id.

7. Abd al Aziz Awda

Address: Unknown

Subject: Id.

8. Ghassan Zayed Ballut

Address: Unknown

Subject: Id.

9. Hatim Naji Fariz

Address: Unknown

Subject: Id.

10. Mazen al Najjar

Address: Unknown

Subject: Id.

Q. All current or former members and/or associates of the <u>al Aqsa Martyrs Brigade</u> terrorist organization. Individuals include, but are not limited to:

1. Zakaria Zubeidi

Address: Unknown

<u>Subject</u>: Individual has information regarding a number of subject matters relative to Plaintiffs' claims, including without limitation: (i) the origins of al Qaeda; (ii) the financial and logistical infrastructure created to support al Qaeda; (iii) al Qaeda's funding, including support from purported Islamic charitable organizations, Islamic financial institutions, and foreign states such as Saudi Arabia; (iv) al Qaeda's-related terrorist attacks or plots; (v) al Qaeda's expansion and participation in other regional jihad campaigns; and (vi) al Qaeda's association with related terrorist organizations.

2. Salim Thabit

Address: Unknown

Subject: Id.

3. Taufik Tirawi

Address: Unknown

Subject: Id.

4. Marwan Barghouti

Address: Unknown

Subject: Id.

- R. All current or former members and/or associates of the <u>Jaish e Mohammed</u> terrorist organization. Individuals include, but are not limited to:
  - 1. Mohammed Masood Azhar Alvi

Address: Unknown

<u>Subject</u>: Individual has information regarding a number of subject matters relative to Plaintiffs' claims, including without limitation: (i) the origins of al Qaeda; (ii) the financial and logistical infrastructure created to support al Qaeda; (iii) al Qaeda's funding, including support from purported Islamic charitable organizations, Islamic financial institutions, and foreign states such as Saudi Arabia; (iv) al Qaeda's-related terrorist attacks or plots; (v) al Qaeda's expansion and participation in other regional jihad campaigns; and (vi) al Qaeda's association with related terrorist organizations.

2. Maulana Massod Azhar

Address: Unknown

Subject: Id.

- S. All current or former members and/or associates of the <u>Lashkar e Tayyiba</u> terrorist organization. Individuals include, but are not limited to:
  - 1. Azam Cheema

Address: Unknown

<u>Subject</u>: Individual has information regarding a number of subject matters relative to Plaintiffs' claims, including without limitation: (i) the origins of al

Qaeda; (ii) the financial and logistical infrastructure created to support al Qaeda; (iii) al Qaeda's funding, including support from purported Islamic charitable organizations, Islamic financial institutions, and foreign states such as Saudi Arabia; (iv) al Qaeda's-related terrorist attacks or plots; (v) al Qaeda's expansion and participation in other regional jihad campaigns; and (vi) al Qaeda's association with related terrorist organizations.

Hafiz Abdul Rahman Makki

Address: Unknown

Subject: Id.

3. Fazeel A Tul Shaykh Abu Mohammed Ameen al Peshawari

Address: Unknown

Subject: Id.

4. Arif Qasmani

Address: Unknown

Subject: Id.

5. Mohammed Yahya Mujahid

Address: Unknown

Subject: Id.

6. Nasir Javaid

Address: Unknown

Subject: Id.

7. Hafiz Abdur Rauf

Address: Unknown

Subject: Id.

8. Mian Abdullah

Address: Unknown

Subject: Id.

9. Mohammad Naushad Alam Khan

Address: Unknown

Subject: Id.

- T. All current or former members and/or associates of the <u>Lashkar e Jhangvi</u> terrorist organization. Individuals include, but are not limited to:
  - 1. Ziauddin Mehsud

Address: Unknown

<u>Subject</u>: Individual has information regarding a number of subject matters relative to Plaintiffs' claims, including without limitation: (i) the origins of al Qaeda; (ii) the financial and logistical infrastructure created to support al Qaeda; (iii) al Qaeda's funding, including support from purported Islamic charitable

organizations, Islamic financial institutions, and foreign states such as Saudi Arabia; (iv) al Qaeda's-related terrorist attacks or plots; (v) al Qaeda's expansion and participation in other regional jihad campaigns; and (vi) al Qaeda's association with related terrorist organizations.

2. Munir Chandio

Address: Unknown

Subject: Id.

3. Rizwan Muqaddam

Address: Unknown

Subject: Id.

4. Oari Zafar

Address: Unknown

Subject: Id.

5. Rizwan Ahmad

Address: Unknown

Subject: Id.

6. Shafiqur Rehman

Address: Unknown

Subject: Id.

U. All current or former members and/or associates of the <u>Armed Islamic Group</u> terrorist organization. Individuals include, but are not limited to:

1. Antar Zouabri

Address: Unknown

<u>Subject</u>: Individual has information regarding a number of subject matters relative to Plaintiffs' claims, including without limitation: (i) the origins of al Qaeda; (ii) the financial and logistical infrastructure created to support al Qaeda; (iii) al Qaeda's funding, including support from purported Islamic charitable organizations, Islamic financial institutions, and foreign states such as Saudi Arabia; (iv) al Qaeda's-related terrorist attacks or plots; (v) al Qaeda's expansion and participation in other regional jihad campaigns; and (vi) al Qaeda's association with related terrorist organizations.

2. Ahmed Ressam

Address: Upon information and belief, the individual is incarcerated in the United States and can be contacted through the Department of Justice and/or the Federal Bureau of Prisons.

Subject: Id.

V. All current or former members and/or associates of the <u>Salafist Group for Call and Combat</u> terrorist organization. Individuals include, but are not limited to:

1. Mokhtar Belmokhtar

Address: Unknown

<u>Subject</u>: Individual has information regarding a number of subject matters relative to Plaintiffs' claims, including without limitation: (i) the origins of al Qaeda; (ii) the financial and logistical infrastructure created to support al Qaeda; (iii) al Qaeda's funding, including support from purported Islamic charitable organizations, Islamic financial institutions, and foreign states such as Saudi Arabia; (iv) al Qaeda's-related terrorist attacks or plots; (v) al Qaeda's expansion and participation in other regional jihad campaigns; and (vi) al Qaeda's association with related terrorist organizations.

2. Mustapha Nasir Ait El Hadi

Address: Unknown

Subject: Id.

3. Djamel Lounici

Address: Unknown

Subject: Id.

4. Mohamed Ben Belgacem Aouadi

Address: Unknown

Subject: Id.

5. Mokhtar Bouchoucha

Address: Unknown

Subject: Id.

6. Tarek Charaabi

Address: Unknown

Subject: Id.

7. Sami Ben Khemais Essid

Address: Unknown

Subject: Id.

- W. All current or former members and/or associates of the <u>Harakat al Shabaab al Mujahideen</u> terrorist organization. Individuals include, but are not limited to:
  - 1. Sheikh Moktar ali Zubeyr

Address: Unknown

Subject: Individual has information regarding a number of subject matters relative to Plaintiffs' claims, including without limitation: (i) the origins of al Qaeda; (ii) the financial and logistical infrastructure created to support al Qaeda; (iii) al Qaeda's funding, including support from purported Islamic charitable organizations, Islamic financial institutions, and foreign states such as Saudi Arabia; (iv) al Qaeda's-related terrorist attacks or plots; (v) al Qaeda's expansion and participation in other regional jihad campaigns; and (vi) al Qaeda's association with related terrorist organizations.

2. Sheikh Mukhtar Robow

Address: Unknown

Subject: Id.

3. Fazul Abdullah Mohammed

Address: Unknown

Subject: Id.

4. Sheikh Muhammad Abu Fa'id

Address: Unknown

Subject: Id.

5. Abu Sulayman al Bandari

Address: Unknown

Subject: Id.

6. Abu Musa Mombasa

Address: Unknown

Subject: Id.

7. Abu Mansoor al Amriki

Address: Unknown

Subject: Id.

8. Mahmud Mujajir

Address: Unknown

Subject: Id.

9. Abdifatah Aweys Abu Hamza

Address: Unknown

Subject: Id.

10. Sheikh Xasan Xuseen

Address: Unknown

Subject: Id.

X. Members, staffers, investigators, and other individuals associated with the National Commission on Terrorist Attacks Upon the United States (the "9-11 Commission"), including without limitation, all individuals who were interviewed by the 9-11 Commission and/or who provided sworn testimony or statements to the 9-11 Commission. Individuals include, but are not limited to:

1. Thomas H. Kean

Address: Upon information and belief, the individual can be contacted through the Partnership For a Secure America, 2000 P Street, N.W., Suite 505,

Washington, D.C. 20036.

<u>Subject</u>: Individual has information regarding a number of subject matters relative to Plaintiffs' claims, including without limitation: (i) the origins of al

Qaeda; (ii) the financial and logistical infrastructure created to support al Qaeda; (iii) al Qaeda's funding, including support from purported Islamic charitable organizations, Islamic financial institutions, and foreign states such as Saudi Arabia; (iv) al Qaeda's-related terrorist attacks or plots; (v) al Qaeda's expansion and participation in other regional jihad campaigns; and (vi) al Qaeda's association with related terrorist organizations.

#### 2. Lee H. Hamilton

Address: Upon information and belief, the individual can be contacted through the Woodrow Wilson International Center for Scholars, Ronald Reagan Building and International Trade Center, One Woodrow Wilson Plaza, 1300 Pennsylvania Ave., N.W., Washington, DC 20004-3027.

Subject: Id.

#### 3. Richard Ben-Veniste

Address: Upon information and belief, the individual can be contacted through Mayer Brown LLP, 1999 K Street, N.W., Washington, D.C. 20006-1101. Subject: *Id*.

### 4. Fred F. Fielding

Address: Upon information and belief, the individual can be contacted through Morgan Lewis & Bockius LLP, 1111 Pennsylvania Ave., N.W., Washington, D.C. 20004-2541.

Subject: Id.

#### 5. Jamie S. Gorelick

<u>Address</u>: Upon information and belief, the individual can be contacted through Wilmer Cutler Pickering Hale and Dorr LLP, 1875 Pennsylvania Avenue, N.W., Washington, D.C. 20006.

Subject: Id.

### 6. Slade Gorton

Address: Upon information and belief, the individual can be contacted through the Partnership For a Secure America, 2000 P Street, N.W., Suite 505, Washington, D.C. 20036.

Subject: Id.

## 7. Bob Kerrey

<u>Address</u>: Upon information and belief, the individual can be contacted through The New School, 66 West 12<sup>th</sup> Street, New York, New York 10011. Subject: *Id*.

#### 8. John F. Lehman

Address: Upon information and belief, the individual can be contacted through J.F. Lehman & Company, 450 Park Avenue, 6th Floor, New York, New York 10022, or 2001 Jefferson Davis Highway, Suite 607, Arlington, VA 22202. Subject: *Id.* 

## 9. Timothy J. Roemer

<u>Address</u>: Upon information and belief, the individual can be contacted through the office of the U.S. Ambassador to the Republic of India.

Subject: Id.

## 10. James R. Thompson

<u>Address</u>: Upon information and belief, the individual resides in the United States. Subject: *Id*.

## 11. Philip D. Zelikow

<u>Address</u>: Upon information and belief, the individual can be contacted through the University of Virginia, Corcoran Department of History, P.O. Box 400180, Charlottesville, VA 22904.

Subject: Id.

#### 12. Chris Kojm

<u>Address</u>: Upon information and belief, the individual can be contacted through the National Intelligence Council, c/o the Office of the Director of National Intelligence, Washington, D.C. 20511.

Subject: Id.

#### 13. Daniel Marcus

<u>Address</u>: Upon information and belief, the individual can be contacted through the American University Washington College of Law, 4801 Massachusetts Avenue, N.W., Washington, D.C. 20016.

Subject: Id.

#### 14. John Roth

<u>Address</u>: Upon information and belief, the individual resides in the United States. <u>Subject</u>: *Id*.

#### 15. Douglas Greenburg

Address: Upon information and belief, the individual can be contacted through Latham & Watkins LLP, 555 Eleventh Street, N.W., Suite 1000, Washington, D.C. 20004-1304.

Subject: Id.

#### 16. Serena Wille

<u>Address</u>: Upon information and belief, the individual can be contacted through Wilmer Cutler Pickering Hale and Dorr LLP, 1875 Pennsylvania Avenue, N.W., Washington, D.C. 20006.

Subject: Id.

## 17. Thomas R. Eldridge

<u>Address</u>: Upon information and belief, the individual resides in the United States. <u>Subject</u>: *Id*.

## 18. Susan Ginsburg

Address: Upon information and belief, the individual can be contacted through the Migration Policy Institute, 1400 16<sup>th</sup> Street, N.W., Suite 300, Washington, D.C. 20036.

Subject: Id.

## 19. Walter T. Hempel II

Address: Upon information and belief, the individual can be contacted through Centra Technology Inc., 25 Burlington Mall Road, Burlington, MA 01803. Subject: *Id.* 

# 20. Janice L. Kephart

<u>Address</u>: Upon information and belief, the individual can be contacted through The Heritage Foundation, 214 Massachusetts Avenue, N.E., Washington, D.C. 20002.

Subject: Id.

## 21. Kelly Moore

<u>Address</u>: Upon information and belief, the individual can be contacted through her webpage at http://www.whatthekel.com.

Subject: Id.

Y. Members, staffers, investigators, and other individuals associated with the Joint Inquiry into the Terrorist Attacks of September 11, 2001, by the House Permanent Select Committee on Intelligence and the Senate Select Committee on Intelligence, including without limitation, all individuals who were interviewed by the Congressional Joint Inquiry and/or who provided sworn testimony or statements to the Congressional Joint Inquiry. Individuals include, but are not limited to:

#### 1. Bob Graham

Address: Upon information and belief, the individual resides in the United States. Subject: Individual has information regarding a number of subject matters relative to Plaintiffs' claims, including without limitation: (i) the origins of al Qaeda; (ii) the financial and logistical infrastructure created to support al Qaeda; (iii) al Qaeda's funding, including support from purported Islamic charitable organizations, Islamic financial institutions, and foreign states such as Saudi Arabia; (iv) al Qaeda's-related terrorist attacks or plots; (v) al Qaeda's expansion and participation in other regional jihad campaigns; and (vi) al Qaeda's association with related terrorist organizations.

## 2. Richard C. Shelby

<u>Address</u>: Upon information and belief, the individual resides in the United States and can be contacted through his Congressional office. Subject: *Id*.

#### 3. Carl Levin

Address: Upon information and belief, the individual resides in the United States

and can be contacted through his Congressional office.

Subject: Id.

#### 4. John D. Rockefeller

<u>Address</u>: Upon information and belief, the individual resides in the United States and can be contacted through his Congressional office.

Subject: Id.

#### 5. Dianne Feinstein

<u>Address</u>: Upon information and belief, the individual resides in the United States and can be contacted through her Congressional office.

Subject: Id.

#### 6. Ron Wyden

<u>Address</u>: Upon information and belief, the individual resides in the United States and can be contacted through his Congressional office.

Subject: Id.

#### 7. Richard J. Durbin

<u>Address</u>: Upon information and belief, the individual resides in the United States and can be contacted through his Congressional office.

Subject: Id.

## 8. Evan Bayh

<u>Address</u>: Upon information and belief, the individual resides in the United States. <u>Subject</u>: *Id*.

#### 9. John Edwards

<u>Address</u>: Upon information and belief, the individual resides in the United States. Subject: *Id*.

#### 10. Barbara Mikulski

<u>Address</u>: Upon information and belief, the individual resides in the United States and can be contacted through her Congressional office.

Subject: Id.

#### 11. Jon Kyl

<u>Address</u>: Upon information and belief, the individual resides in the United States and can be contacted through his Congressional office.

Subject: Id.

#### 12. James M. Inhofe

<u>Address</u>: Upon information and belief, the individual resides in the United States and can be contacted through his Congressional office.

Subject: Id.

#### 13. Orrin Hatch

Address: Upon information and belief, the individual resides in the United States

and can be contacted through his Congressional office.

Subject: Id.

#### 14. Pat Roberts

<u>Address</u>: Upon information and belief, the individual resides in the United States and can be contacted through his Congressional office.

Subject: Id.

#### 15. Mike DeWine

<u>Address</u>: Upon information and belief, the individual resides in the United States and can be contacted through the Ohio Attorney General's office.

Subject: Id.

## 16. Fred Thompson

Address: Upon information and belief, the individual resides in the United States.

Subject: Id.

## 17. Richard Lugar

<u>Address</u>: Upon information and belief, the individual resides in the United States and can be contacted through his Congressional office.

Subject: Id.

### 18. Porter J. Goss

Address: Upon information and belief, the individual resides in the United States.

Subject: Id.

## 19. Nancy Pelosi

<u>Address</u>: Upon information and belief, the individual resides in the United States and can be contacted through her Congressional office.

Subject: Id.

## 20. Doug Bereuter

Address: Upon information and belief, the individual resides in the United States.

Subject: Id.

#### 21. Michael N. Castle

Address: Upon information and belief, the individual resides in the United States.

Subject: Id.

### 22. Sherwood L. Boehlert

Address: Upon information and belief, the individual resides in the United States.

Subject: Id.

#### 23. Jim Gibbons

Address: Upon information and belief, the individual resides in the United States

and can be contacted through the Nevada Governor's office.

## 24. Ray LaHood

<u>Address</u>: Upon information and belief, the individual resides in the United States and can be contacted through the office of the United States Secretary of Transportation.

Subject: Id.

## 25. Randy "Duke" Cunningham

Address: Upon information and belief, the individual is incarcerated in the United States and can be contacted through the Department of Justice and/or the Federal Bureau of Prisons.

Subject: Id.

#### 26. Peter Hoekstra

<u>Address</u>: Upon information and belief, the individual resides in the United States and can be contacted through his Congressional office.

Subject: Id.

#### 27. Richard Burr

<u>Address</u>: Upon information and belief, the individual resides in the United States and can be contacted through his Congressional office.

Subject: Id.

## 28. Saxby Chambliss

<u>Address</u>: Upon information and belief, the individual resides in the United States and can be contacted through his Congressional office.

Subject: Id.

#### 29. Terry Everett

<u>Address</u>: Upon information and belief, the individual resides in the United States. <u>Subject</u>: *Id*.

## 30. Sanford D. Bishop

Address: Upon information and belief, the individual resides in the United States and can be contacted through his Congressional office.

Subject: Id.

#### 31. Jane Harman

<u>Address</u>: Upon information and belief, the individual resides in the United States and can be contacted through his Congressional office.

Subject: Id.

#### 32. Gary A. Condit

<u>Address</u>: Upon information and belief, the individual resides in the United States. Subject: *Id*.

#### 33. Tim Roemer

Address: Upon information and belief, the individual can be contacted through

the office of the U.S. Ambassador to the Republic of India.

Subject: Id.

34. Silvestre Reyes

Address: Upon information and belief, the individual resides in the United States

and can be contacted through his Congressional office.

Subject: Id.

35. Leonard L. Boswell

Address: Upon information and belief, the individual resides in the United States

and can be contacted through his Congressional office.

Subject: Id.

36. Collin C. Peterson

Address: Upon information and belief, the individual resides in the United States

and can be contacted through his Congressional office.

Subject: Id.

37. Bud Cramer

Address: Upon information and belief, the individual resides in the United States.

Subject: Id.

Z. All individuals who have appeared as witnesses in hearings before the U.S. House of Representatives or U.S. Senate and provided sworn testimony and/or statements regarding terrorism-related issues, including without limitation, testimony and/or statements regarding Osama bin Laden, al Qaeda and other terrorist organizations, terrorist plots and/or attacks conducted by al Qaeda or associated terrorist groups, terrorism financing, and the role of purported Islamic charitable organizations and Islamic financial institutions in the al Qaeda terrorism network. Individuals include, but are not limited to:

1. Stuart A. Levey

Address: Upon information and belief, the individual resides in the United States

and can be contacted through the Department of the Treasury.

Subject: Individual has information regarding a number of subject matters relative to Plaintiffs' claims, including without limitation: (i) the origins of al Qaeda; (ii) the financial and logistical infrastructure created to support al Qaeda; (iii) al Qaeda's funding, including support from purported Islamic charitable organizations, Islamic financial institutions, and foreign states such as Saudi Arabia; (iv) al Qaeda's-related terrorist attacks or plots; (v) al Qaeda's expansion and participation in other regional jihad campaigns; and (vi) al Qaeda's association with related terrorist organizations.

2. Matthew A. Levitt

Address: Upon information and belief, the individual can be contacted through the Washington Institute for Near East Policy, 1828 L Street N.W., Suite 1050

Washington D.C. 20036.

Subject: Id.

3. Lee S. Wolosky

Address: Upon information and belief, the individual can be contacted through Boies, Schiller & Flexner LLP, 575 Lexington Avenue, New York, New York 10022.

Subject: Id.

4. Robert S. Mueller III

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Federal Bureau of Investigation.

Subject: Id.

5. R. Richard Newcomb

Address: Upon information and belief, the individual can be contacted through DLA Piper, 500 Eighth Street, N.W., Washington D.C. 20004.

Subject: Id.

- AA. Current or former counter-terrorism officials and advisors from U.S. Government departments and agencies, including without limitation: Department of State;
  Department of the Treasury; Department of Homeland Security; Department of Justice;
  Department of Defense; Central Intelligence Agency; Federal Bureau of Investigation;
  Defense Intelligence Agency; National Security Agency; and the Office of the Director of National Intelligence. Individuals include, but are not limited to:
  - 1. Stuart A. Levey

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Department of the Treasury.

Subject: Individual has information regarding a number of subject matters relative to Plaintiffs' claims, including without limitation: (i) the origins of al Qaeda; (ii) the financial and logistical infrastructure created to support al Qaeda; (iii) al Qaeda's funding, including support from purported Islamic charitable organizations, Islamic financial institutions, and foreign states such as Saudi Arabia; (iv) al Qaeda's-related terrorist attacks or plots; (v) al Qaeda's expansion and participation in other regional jihad campaigns; and (vi) al Qaeda's association with related terrorist organizations.

2. R. Richard Newcomb

Address: Upon information and belief, the individual can be contacted through DLA Piper, 500 Eighth Street, N.W., Washington D.C. 20004. Subject: *Id.* 

3. Mark D. Roberts

<u>Address</u>: Upon information and belief, the individual resides in the United States and can be contacted through the Department of the Treasury.

### 4. Barbara C. Hammerle

<u>Address</u>: Upon information and belief, the individual resides in the United States and can be contacted through the Department of the Treasury.

Subject: Id.

## 5. Matthew A. Levitt

Address: Upon information and belief, the individual can be contacted through the Washington Institute for Near East Policy, 1828 L Street N.W., Suite 1050 Washington D.C. 20036.

Subject: Id.

## 6. Ambassador James B. Foley

Address: Upon information and belief, the individual can be contacted through the office of the U.S. Ambassador to the Republic of Croatia.

Subject: Id.

## 7. David D. Aufhauser

Address: Upon information and belief, the individual can be contacted through Williams & Connolly, 725 Twelfth Street, N.W., Washington, D.C. 20005. Subject: *Id*.

## 8. George B. Wolfe

Address: Upon information and belief, the individual can be contacted through Nelson Mullins Riley & Scarborough LLP, Meridian, 17th Floor, 1320 Main Street, Columbia, South Carolina 29201.

Subject: Id.

#### 9. Patrick J. Fitzgerald

<u>Address</u>: Upon information and belief, the individual can be contacted through the office of the United States Attorney for the Northern District of Illinois, 219 S. Dearborn St., 5th Floor, Chicago, IL 60604.

Subject: Id.

## 10. Philip C. Wilcox, Jr.

<u>Address</u>: Upon information and belief, the individual can be contacted through the Foundation for Middle East Peace, 1761 N Street, N.W., Washington, D.C. 20036.

Subject: Id.

#### 11. R. James Woolsey, Jr.

<u>Address</u>: Upon information and belief, the individual can be contacted through Booz Allen Hamilton, 901 15<sup>th</sup> Street, N.W., Suite 900, Washington, D.C. 20005. <u>Subject</u>: *Id*.

## 12. George J. Tenet

Address: Upon information and belief, the individual can be contacted through Allen & Company LLC, 711 Fifth Avenue, New York, New York. Subject: *Id*.

13. Robert S. Mueller III

<u>Address</u>: Upon information and belief, the individual resides in the United States and can be contacted through the Federal Bureau of Investigation.

Subject: Id.

14. Louis J. Freeh

Address: Upon information and belief, the individual can be contacted through Freeh Group International Solutions LLC, 500 Delaware Avenue, Suite 710, Wilmington, Delaware 19801.

Subject: Id.

15. William S. Sessions

Address: Upon information and belief, the individual can be contacted through Holland & Knight LLP, 2099 Pennsylvania Avenue, N.W., Suite 100, Washington, D.C. 20006.

Subject: Id.

BB. Former members of the Arab mujahideen that were involved in, and/or associated with, regional jihad campaigns occurring around the globe following the Soviet-Afghan conflict, including without limitation: Bosnia, Chechnya, Kosovo, Sudan, Kashmir, Pakistan, Afghanistan, Iraq, Turkey, Indonesia, Malaysia, Algeria, the Philippines, Somalia, Palestine, Yemen, Kenya, Tanzania, and Egypt. Individuals include, but are not limited to those persons identified in <a href="Attachment A">Attachment A</a>, which includes last known addresses. Individuals have information regarding a number of subject matters relative to Plaintiffs' claims, including without limitation: (i) the origins of al Qaeda; (ii) the financial and logistical infrastructure created to support al Qaeda; (iii) al Qaeda's funding, including support from purported Islamic charitable organizations, Islamic financial institutions, and foreign states such as Saudi Arabia; (iv) al Qaeda's-related terrorist attacks or plots; (v) al Qaeda's expansion and participation in other regional jihad campaigns; and (vi) al Qaeda's association with related terrorist organizations.

CC. All individuals that were involved in, and/or associated with, any al Qaeda-related terrorist attack or plot. Individuals include, but are not limited to:

## 1. Osama bin Laden

Address: Unknown

<u>Subject</u>: Individual has information regarding a number of subject matters relative to Plaintiffs' claims, including without limitation: (i) the origins of al Qaeda; (ii) the financial and logistical infrastructure created to support al Qaeda; (iii) al Qaeda's funding, including support from purported Islamic charitable organizations, Islamic financial institutions, and foreign states such as Saudi Arabia; (iv) al Qaeda's-related terrorist attacks or plots; (v) al Qaeda's expansion and participation in other regional jihad campaigns; and (vi) al Qaeda's association with related terrorist organizations.

# 2. Ayman al Zawahiri

Address: Unknown

Subject: Id.

#### 3. Khalid Sheikh Mohammed

Address: United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba.

Subject: Id.

## 4. Abu Zubaydah

<u>Address</u>: United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba. Subject: *Id*.

#### 5. Ramzi Binalshibh

Address: United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba. Subject: *Id*.

DD. Federal Bureau of Investigation 302 Cooperating Witnesses. Individuals include, but are not limited to:

#### 1. Jamal Ahmad al Fadl

<u>Address</u>: Upon information and belief, al Fadl is in the protective custody of the United States.

<u>Subject</u>: Individual has information regarding a number of subject matters relative to Plaintiffs' claims, including without limitation: (i) the origins of al Qaeda; (ii) the financial and logistical infrastructure created to support al Qaeda; (iii) al Qaeda's funding, including support from purported Islamic charitable organizations, Islamic financial institutions, and foreign states such as Saudi Arabia; (iv) al Qaeda's-related terrorist attacks or plots; (v) al Qaeda's expansion and participation in other regional jihad campaigns; and (vi) al Qaeda's association with related terrorist organizations.

EE. Individuals detained by the United States Government following the September 11, 2001 terrorist attacks and who are currently, or were previously, incarcerated at the U.S. Naval Base at Guantanamo Bay, Cuba. Individuals include, but are not limited to:

### 1. Khalid Sheikh Mohammed

Address: United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba. Subject: Individual has information regarding a number of subject matters relative to Plaintiffs' claims, including without limitation: (i) the origins of al Qaeda; (ii) the financial and logistical infrastructure created to support al Qaeda; (iii) al Qaeda's funding, including support from purported Islamic charitable organizations, Islamic financial institutions, and foreign states such as Saudi Arabia; (iv) al Qaeda's-related terrorist attacks or plots; (v) al Qaeda's expansion and participation in other regional jihad campaigns; and (vi) al Qaeda's association with related terrorist organizations.

## 2. Ramzi bin al Shibh

<u>Address</u>: United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba. Subject: *Id*.

## 3. Abu Zubaydah

<u>Address</u>: United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba. Subject: *Id*.

#### 4. Ali Abdul Aziz Ali

<u>Address</u>: United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba. <u>Subject</u>: *Id*.

## 5. Abu Faraj al Libi

<u>Address</u>: United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba. Subject: *Id*.

## 6. Mohd Farik bin Amin (a/k/a Zubair)

Address: United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba. Subject: *Id.* 

#### 7. Walid bin Attash

Address: United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba. Subject: *Id.* 

#### 8. Abd al Rahim al Nashiri

<u>Address</u>: United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba. <u>Subject</u>: *Id*.

#### 9. Majid Khan

Address: United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba. Subject: *Id*.

## 10. Mohammed Nazir bin Lep (a/k/a Lillie)

<u>Address</u>: United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba. <u>Subject</u>: *Id*.

# 11. Mustafa Ahmad al Hawsawi

<u>Address</u>: United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba. Subject: *Id*.

# 12. Riduan bin Isomuddin (a/k/a Hambali)

Address: United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba. Subject: *Id*.

# 13. Ahmed Khalfan Ghailani

<u>Address</u>: Upon information and belief, the individual is incarcerated in the United States and can be contacted through the Department of Justice and/or the Federal Bureau of Prisons.

Subject: Id.

# 14. Gouled Hassan Dourad

<u>Address</u>: United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba. <u>Subject</u>: *Id*.

# 15. Samir N. al Hasan

<u>Address</u>: United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba. <u>Subject</u>: International Islamic Relief Organization's provision of material and financial support to Osama bin Laden and the al Qaeda terrorist organization.

# 16. Zaid Muhamamd Sa'ad al Husayn

Address: Upon information and belief, the individual was transferred to Saudi Arabia on November 9, 2007.

<u>Subject</u>: Al Haramain Islamic Foundation's provision of material and financial support to Osama bin Laden and the al Qaeda terrorist organization.

#### 17. Abdel Hadi Mohammed Badan al Sebaii Sebaii

Address: Upon information and belief, the individual was transferred to Saudi Arabia on May 18, 2006.

Subject: Id.

# 18. Omar Rajab Amin

Address: Upon information and belief, the individual was transferred to Kuwait on September 14, 2006.

Subject: Id.

# 19. Saed Khatem al Malki

<u>Address</u>: Upon information and belief, the individual was transferred to Saudi Arabia on May 18, 2006.

Subject: Id.

# 20. Abdul Rahman Owaid Mohammad al Juaid

<u>Address</u>: Upon information and belief, the individual was transferred to Saudi Arabia on July 15, 2007.

# 21. Turki Mash Awi Zayid al Asiri

Address: Upon information and belief, the individual was transferred to Saudi Arabia on November 9, 2007.

<u>Subject</u>: Al Rajhi Bank's and SAAR Network's provision of material and financial support to Osama bin Laden and the al Qaeda terrorist organization.

# 22. Rashed Awad Khalaf Balkhair

<u>Address</u>: Upon information and belief, the individual was transferred to Saudi Arabia on February 20, 2007.

<u>Subject</u>: International Islamic Relief Organization's provision of material and financial support to Osama bin Laden and the al Qaeda terrorist organization.

#### 23. Yunis Abdurrahman Shokuri

<u>Address</u>: United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba. <u>Subject</u>: Saudi charity's provision of material and financial support to Osama bin Laden and the al Qaeda terrorist organization.

# 24. Said Muhammad Husayn Qahtani

Address: United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba. Subject: International Islamic Relief Organization's and Al Haramain Islamic Foundation's provision of material and financial support to Osama bin Laden and the al Qaeda terrorist organization.

# 25. Fahd Muhammed Abdullah al Fouzan

<u>Address</u>: Upon information and belief, the individual was transferred to Saudi Arabia on September 5, 2007.

<u>Subject</u>: Al Haramain Islamic Foundation's provision of material and financial support to Osama bin Laden and the al Qaeda terrorist organization.

# 26. Anwar Hamden Muhammed al Nur

Address: Upon information and belief, the individual was transferred to Saudi Arabia on December 13, 2006.

<u>Subject</u>: International Islamic Relief Organization's provision of material and financial support to Osama bin Laden and the al Qaeda terrorist organization.

#### 27. Sawad al Madani

<u>Address</u>: United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba. <u>Subject</u>: *Id*.

# 28. Fadil Husayn Salih Hintif

<u>Address</u>: United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba. <u>Subject</u>: Saudi Red Crescent's provision of material and financial support to Osama bin Laden and the al Qaeda terrorist organization.

# 29. Abdul Aziz Abdul Rahman Abdul Aziz al Baddah

<u>Address</u>: Upon information and belief, the individual was transferred to Saudi Arabia on June 24, 2006.

<u>Subject</u>: Al Haramain Islamic Foundation's provision of material and financial support to Osama bin Laden and the al Qaeda terrorist organization.

#### 30. Abd al Aziz Muhammad Ibrahim al Nasir

<u>Address</u>: Upon information and belief, the individual was transferred to Saudi Arabia on December 13, 2006.

Subject: Id.

# 31. Mohamed Atiq Awayd al Harbi

Address: Upon information and belief, the individual was transferred to Saudi Arabia on November 9, 2007.

<u>Subject</u>: Saudi Red Crescent's provision of material and financial support to Osama bin Laden and the al Qaeda terrorist organization.

# 32. Wasm Awwad Umar al Wasim

<u>Address</u>: Upon information and belief, the individual was transferred to Saudi Arabia on June 24, 2006.

<u>Subject</u>: Al Haramain Islamic Foundation's provision of material and financial support to Osama bin Laden and the al Qaeda terrorist organization.

# 33. Abdallah Ibrahim al Rushaydan

<u>Address</u>: Upon information and belief, the individual was transferred to Saudi Arabia on May 18, 2006.

<u>Subject</u>: International Islamic Relief Organization's provision of material and financial support to Osama bin Laden and the al Qaeda terrorist organization.

# 34. Rashid Abd al Muslih Qa Id al Qa Id

<u>Address</u>: Upon information and belief, the individual was transferred to Saudi Arabia on June 24, 2006.

Subject: Id.

#### 35. Sami al Haj

Address: Upon information and belief, the individual was transferred to Saudi Arabia on April 30, 2008.

<u>Subject</u>: Al Haramain Islamic Foundation's provision of material and financial support to Osama bin Laden and the al Qaeda terrorist organization.

#### 36. Said Ali al Shihri

<u>Address</u>: Upon information and belief, the individual was transferred to Saudi Arabia on November 9, 2007, but escaped to join al Qaeda in Yemen. <u>Subject</u>: Saudi Red Crescent's provision of material and financial support to Osama bin Laden and the al Qaeda terrorist organization.

# 37. Ghanim Abdul Rahman al Harbi

Address: Upon information and belief, the individual was transferred to Saudi Arabia on July 15, 2007.

<u>Subject</u>: International Islamic Relief Organization's provision of material and financial support to Osama bin Laden and the al Qaeda terrorist organization.

# 38. Tariq Mahmoud Ahmed al Sawah

<u>Address</u>: United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba. <u>Subject</u>: *Id*.

# 39. Jamal Muhammed Alwai

Address: Upon information and belief, the individual was transferred to Yemen on December 19, 2009.

<u>Subject</u>: Al Haramain Islamic Foundation's provision of material and financial support to Osama bin Laden and the al Qaeda terrorist organization.

# 40. Khalid Mahomoud Abdul Wahab al Asmr

Address: Upon information and belief, the individual was transferred to Jordan on July 19, 2005.

Subject: Id.

# 41. Ahmed Hassan Jamil Suleyman

<u>Address</u>: Upon information and belief, the individual was transferred to Jordan on November 2, 2007.

<u>Subject</u>: International Islamic Relief Organization's provision of material and financial support to Osama bin Laden and the al Qaeda terrorist organization.

# 42. Ahmed Zeid Salem Zohair

<u>Address</u>: Upon information and belief, the individual was transferred to Saudi Arabia on June 12, 2007.

<u>Subject</u>: Al Haramain Islamic Foundation's provision of material and financial support to Osama bin Laden and the al Qaeda terrorist organization.

# 43. Mohammed Hussein Abdallah

<u>Address</u>: Upon information and belief, the individual was transferred to Saudi Arabia on November 4, 2008.

<u>Subject</u>: International Islamic Relief Organization's and Saudi Red Crescent's provision of material and financial support to Osama bin Laden and the al Qaeda terrorist organization.

# 44. Mustafa Ahmed Hamlily

Address: Upon information and belief, the individual was transferred to Algeria on July 2, 2008.

<u>Subject</u>: International Islamic Relief Organization's provision of material and financial support to Osama bin Laden and the al Qaeda terrorist organization.

#### 45. Salim Mahmoud Adem Mohammed Bani Amir

<u>Address</u>: Upon information and belief, the individual was transferred to Sudan on December 12, 2007.

<u>Subject</u>: Al Haramain Islamic Foundation's provision of material and financial support to Osama bin Laden and the al Qaeda terrorist organization.

# 46. Abbas Habid Rumi al Naely

Address: Upon information and belief, the individual was transferred to Iraq on

July 17, 2009.

<u>Subject</u>: International Islamic Relief Organization's provision of material and financial support to Osama bin Laden and the al Qaeda terrorist organization.

# 47. Abdul Latif Elbanna

<u>Address</u>: Upon information and belief, the individual was transferred to the United Kingdom on December 19, 2007.

Subject: Id.

# 48. Mammar Ameur

Address: Upon information and belief, the individual was transferred to Algeria on October 6, 2008.

<u>Subject</u>: World Assembly of Muslim Youth's provision of material and financial support to Osama bin Laden and the al Qaeda terrorist organization.

# 49. Adel Hassan Hamed

Address: Upon information and belief, the individual was transferred to Sudan on December 12, 2007.

Subject: Id.

# 50. Abdul al Salam al Hilal

<u>Address</u>: United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba. <u>Subject</u>: Al Haramain Islamic Foundation's provision of material and financial support to Osama bin Laden and the al Qaeda terrorist organization.

# 51. Bensayah Belkacem

<u>Address</u>: United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba. <u>Subject</u>: Saudi High Commission's provision of material and financial support to Osama bin Laden and the al Qaeda terrorist organization.

# 52. Saber Mahfouz Lahmar

<u>Address</u>: Upon information and belief, the individual was transferred to France on November 30, 2009.

Subject: Id.

# 53. Mohammed Nechle

<u>Address</u>: Upon information and belief, the individual was transferred to Bosnia-Herzegovina on December 16, 2008.

Subject: Id.

#### 54. Mustafa Ait Idr

<u>Address</u>: Upon information and belief, the individual was transferred to Bosnia-Herzegovina on December 16, 2008.

Subject: Id.

# 55. Lakhdar Boumediene

Address: Upon information and belief, the individual was transferred to France

on May 15, 2009.

Subject: Id.

56. Boudella al Hajj

Address: Upon information and belief, the individual was transferred to Bosnia-

Herzegovina on December 16, 2008.

Subject: Id.

FF. All individuals associated with the Dar al Imam al Shaif'i terrorist training school in the Philippines, including without limitation, school administrators or officials, teachers, religious leaders, graduates, or former students. Individuals include, but are not limited to:

1. Mohammed Jamal Khalifa

Address: Unknown

Subject: Id.

2. Abduragak Janjalani

Address: Unknown

Subject: Id.

Department of Justice representatives involved in the prosecutions of the following GG. individuals, including without limitation: Muhammad Atef; Wadih el Hage; Fazul Abdullah Mohammed; Mohamed Sadeek Odeh; Mohamed Rashed Daoud al Owhali; Ahmed Khalfan Ghailani; Ahmed Ressam; Abdelmajid Dahoumane; Zacarias Moussaoui; Richard Reid; Perouz Sedaghaty; Ahmed Ibrahim al Muhgassil; Mohammed Salameh; Nidal Ayyad; Mahmud Abouhalima; Ahmad Ajaj; Sheikh Omar Abdel Rahman; Ey Sayyid Nosair; Ibrahim A. El Gabrowny; Siddig Ibrahim Siddig Ali; Clement Hampton El; Amir Abdelghani; Fares Khallafalla; Tarig Elhassan; Fadil Abdelghani; Mohammed Saleh; Victor Alvarez; Matarawy Mohammed Said Saleh; Mustafa Kamel Mustafa; Oussama Abdullah Kassir; Haroon Rashid Aswat; Mohammed Ali Hassan al Moayad; Mohammed Mohsen Yahya Zayed; Mohammad Salman Farooq Oureshi; Muhammad Salah; Abdel Haleem al Ashqar; Mousa Abu Marzook; Mohammed Hussein; Umar Farouk Abdulmutallab; Jamal Ahmed Mohammed Ali al Badawi; Fahd al Ouso; Iyman Faris; Enaam Arnaout; Abdulrahman Alamoudi; Oussama Ziade; Buford George Peterson; Najibullah Zazi, Mohamad Wali Zazi; Ahmad Afzali; Aafia Siddiqui; Adnan Shukrijumah; Jose Padilla; Adham Hassoun, Mohamed Hesham Youssef; Kifah Jayyousi; Ahmed Omar Abu Ali; Ali Salah Khalah al Marri; Khalid Sheikh Mohammed; Ali Abd al Aziz Ali; Ramzi bin al Shibh; Abu Zubaydah; Mustafa Ahmed al Hawsawi; Abu Faraj al Libi; Abd al Rahim al Nashiri; Majod Khan; Mohammed Nazir bin Lep; Riduan bin Isomuddin (a/k/a "Hambali"); Mohd Farik bin Amin (a/k/a "Zubair"); Walid bin Attash; Gouled Hassan Dourad; Ramzi Ahmed Yousef; Abdul Hakim Murad; and Wali Khan Amin Shah. Individuals include, but are not limited to:

1. Patrick J. Fitzgerald

<u>Address</u>: Upon information and belief, the individual can be contacted through the office of the United States Attorney for the Northern District of Illinois, 219 S.

Dearborn St., 5th Floor, Chicago, IL 60604.

<u>Subject</u>: Individual has information regarding a number of subject matters relative to Plaintiffs' claims, including without limitation: (i) the origins of al Qaeda; (ii) the financial and logistical infrastructure created to support al Qaeda; (iii) al Qaeda's funding, including support from purported Islamic charitable organizations, Islamic financial institutions, and foreign states such as Saudi Arabia; (iv) al Qaeda's-related terrorist attacks or plots; (v) al Qaeda's expansion and participation in other regional jihad campaigns; and (vi) al Qaeda's association with related terrorist organizations.

# 2. Deborah L. Steiner

Address: Upon information and belief, the individual can be contacted through Latham & Watkins LLP, 233 South Wacker Drive, Suite 5800, Chicago IL 60606. Subject: *Id.* 

# 3. John C. Kocoras

<u>Address</u>: Upon information and belief, the individual can be contacted through McDermott, Will & Emery, 227 West Monroe Street, Chicago, IL 60606. Subject: *Id*.

# 4. Marcos Daniel Jimenez

Address: Upon information and belief, the individual can be contacted through Kasowitz Benson Torres & Friedman LLP, The Four Seasons Tower 1441 Brickell Avenue Suite 1420, Miami, FL 33131. Subject: *Id*.

# 5. Russell R. Killinger

<u>Address</u>: Upon information and belief, the individual resides in the United States and can be contacted through the Department of Justice. Subject: *Id*.

# 6. Preet Bharara

<u>Address</u>: Upon information and belief, the individual can be contacted through the office of the United States Attorney for the Southern District of New York, One St. Andrews Plaza, New York, NY 10007. Subject: *Id*.

# 7. Michael Farbiarz

<u>Address</u>: Upon information and belief, the individual resides in the United States and can be contacted through the Department of Justice. <u>Subject</u>: *Id*.

# 8. Harry A. Chernoff

<u>Address</u>: Upon information and belief, the individual resides in the United States and can be contacted through the Department of Justice. <u>Subject</u>: *Id*.

# 9. Nicholas Lewin

<u>Address</u>: Upon information and belief, the individual resides in the United States and can be contacted through the Department of Justice.

Subject: Id.

# 10. Sean S. Buckley

<u>Address</u>: Upon information and belief, the individual resides in the United States and can be contacted through the Department of Justice.

Subject: Id.

# 11. Paul J. McNulty

Address: Upon information and belief, the individual can be contacted through Baker & McKenzie LLP, 815 Connecticut Avenue, N.W., Washington, DC 20006.

Subject: Id.

# 12. Mary Jo White

<u>Address</u>: Upon information and belief, the individual can be contacted through Debevoise & Plimpton, 919 Third Avenue, New York, NY 10022.

Subject: Id.

# 13. Gordon D. Kromberg

<u>Address</u>: Upon information and belief, the individual resides in the United States and can be contacted through the Department of Justice.

Subject: Id.

#### 14. Steven P. Ward

<u>Address</u>: Upon information and belief, the individual resides in the United States and can be contacted through the Department of Justice.

Subject: Id.

# 15. Christopher A. Wray

Address: Upon information and belief, the individual can be contacted through King & Spalding, 1700 Pennsylvania Avenue, N.W., Suite 200, Washington, D.C. 20006.

Subject: Id.

# 16. Andrew C. McCarthy

<u>Address</u>: Upon information and belief, the individual can be contacted through The Foundation for Defense of Democracies, P.O. Box 33249, Washington, D.C. 20033.

Subject: Id.

# 17. Katrina C. Pflaumer

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Department of Justice.

#### 18. Andrew R. Hamilton

<u>Address</u>: Upon information and belief, the individual resides in the United States and can be contacted through the Department of Justice.

Subject: Id.

# 19. The Honorable Steven C. Gonzalez

<u>Address</u>: Upon information and belief, the individual can be contacted through the King County Superior Court, 516 3rd Ave, Rm C-203, Seattle, WA 98104. Subject: *Id.* 

# HH. Individuals identified in the defendants' Initial Disclosures, including but not limited to:

# 1. Osama bin Laden

Address: Unknown

Subject: Information relating to Plaintiffs' claims against Dubai Islamic Bank.

# 2. Mustafa Ahmed al Hisawi

<u>Address</u>: United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba. Subject: *Id*.

#### 3. Abdulla Saeed Ahmed al Sharif

<u>Address</u>: Upon information and belief, the individual can be contacted through the attorneys at Clifford Chance U.S. LLP, 31 West 52<sup>nd</sup> Street, New York, New York 10019-6131.

Subject: Id.

# 4. Mohamed Ghayyath

Address: Unknown

Subject: Id.

# 5. Mohammed Ayoub Mohammed

Address: Unknown

Subject: Id.

#### 6. Zohari Saeed al Rabii

<u>Address</u>: Upon information and belief, the individual can be contacted through the attorneys at Clifford Chance U.S. LLP, 31 West 52<sup>nd</sup> Street, New York, New York 10019-6131.

Subject: Id.

# 7. Taymerz Zendaki

<u>Address</u>: Upon information and belief, the individual can be contacted through the attorneys at Clifford Chance U.S. LLP, 31 West 52<sup>nd</sup> Street, New York, New York 10019-6131.

# 8. Current or former government officials

Address: Unknown

Subject: Id.

# 9. James Risen

Address: Upon information and belief, the individual resides in the United States.

Subject: Id.

# 10. Benjamin Weiser

Address: Upon information and belief, the individual resides in the United States.

Subject: Id.

# 11. Other Journalists

Address: Unknown

Subject: Id.

# 12. Current or former employees of financial institutions

Address: Unknown

Subject: Id.

#### 13. Dr. Abdelmoniem El Hillali

<u>Address</u>: Upon information and belief, the individual can be contacted through the attorneys at Manning Sossamon PLLC, 1120 20<sup>th</sup> Street, N.W., Suite 700N, Washington, D.C. 20036.

<u>Subject</u>: Information relating to Plaintiffs' claims against Sana Bell, Inc. and Sanabel al Kheer, Inc.

# 14. Gregory Brown

<u>Address</u>: Upon information and belief, the individual can be contacted through the attorneys at Manning Sossamon PLLC, 1120 20<sup>th</sup> Street, N.W., Suite 700N, Washington, D.C. 20036.

Subject: Id.

# 15. M. Yaqub Mirza

<u>Address</u>: Upon information and belief, the individual can be contacted through the attorneys at Luque Marino, 910 17<sup>th</sup> Street, N.W., Suite 800, Washington, D.C. 20006, and Law Office of Steven Barentzen, 1575 Eye Street, N.W., Suite 300, Washington, D.C. 20005.

Subject: Id.

# 16. Henry Hassan

Address: 6404 Seven Corners Place #N, Falls Church, VA 22044

Subject: Id.

# 17. Current or former officials with BMI, Inc.

Address: Unknown

# 18. Sameer al Radhi

Address: Mecca, Saudi Arabia. Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

<u>Subject</u>: Information relating to Plaintiffs' claims against the Muslim World League.

# 19. Ahmed Thomson, Esq.

<u>Address</u>: Wynn Chambers, Winchester House 259-269 Old Marylebone Road, NW1 5RA London, United Kingdom. Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036. <u>Subject</u>: *Id*.

# 20. Ahmed Makdom

<u>Address</u>: 46 Google St. London, W1T 4LU, United Kingdom. Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Id.

# 21. Saud Algrean

22.

<u>Address</u>: Madrid, Spain. Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036. Subject: *Id*.

Abdul Rahman al Oasimi al Bakali

Address: Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Id.

#### 23. Mohamed al Hasani

Address: P.O. Box 537, Makka, Saudi Arabia. Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036. Subject: *Id.* 

#### 24. Fahad bin Sand al Harbi

Address: Jalan Raya Cipinang Jaya No. 90, Jakarta Timur 13410, P.O. Box 4563, Jakarta 12045 Indonesia

Subject: Id.

# 25. Saeed Nowefae al Hamzi

Address: MWL office, Balai Islam, First Floor, No. 250-D Jalan IPOH 51200 Kuala Lumpur, Malaysia. Upon information and belief, the individual can be

contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036. Subject: *Id*.

#### 26. Hussein Daifallah al Malki

Address: P.O. Box 811811, Amman, Jordan. Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036. Subject: *Id.* 

# 27. Fadel Khloud

Address: MWL office, P.O. Box 8570 Wuse Abuja, Nigeria. Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Id.

# 28. Ismail Dream

Address: Bureau de la League Islamique Mondiale, Rue Beranger Ferraud X Masclary 1-E Etage Dakar, P.O. Box 3860. Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036. Subject: *Id.* 

# 29. Abdulaziz Mohamed Salem Kamis

Address: Liaison office, South Africa Region, P.O. Box 4406, Randburg 2125 Johannesburg, South Africa. Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036. Subject: *Id.* 

#### 30. Sami Al Harbi

Address: MWL office, Waiyaki Way Road, West Land Area, P.O. Box 52871, Nairobi, Kenya. Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: *Id.* 

# 31. Farid Alkotani

Address: Viale Della Moschea 85, 00197 Roma, Italy. Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036. Subject: *Id*.

# 32. Hashem Almahrogi

Address: MWL office, AM Bruckhaufen 3, A-1210 Vienna, Austria. Upon

information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Id.

# 33. Abdul Rahim Kortic

Address: MWL office, Vodroffsvej 8, 1900 Frederickseberg, Kobenhaven, Denmark. Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Id.

#### 34. Dr. Ahmad H. Sakr

Address: P.O. Box 140, Lombard, Ill. 60148

Subject: Id.

# 35. Dr. Vagar A. Hamdani

Address: 635 East 14th Street, New York, New York, 10009

Subject: Id.

#### 36. Dawud Assad

Address: 99 Woodview Drive, Old Bridge, New Jersey

Subject: Id.

# 37. Dr. Muzamil H. Siddiqi

Address: 5 Peabody Terrace, #22, Cambridge, Mass. 02138

Subject: Id.

# 38. Dr. Osman Ahmed

Address: 190 Sherman Avenue, Glen Ridge, New Jersey 07028

Subject: Id.

# 39. Dr. Omar Z. Ghobashy

Address: 85 Wildwood Road, New Rochelle, New York 10804

Subject: Id.

# 40. Amir al Islam

Address: 44 South Munn Avenue, East Orange, New Jersey 07018

Subject: Id.

# 41. El Ayouty

Address: P.O. Box 780, Jeddah 21241. Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Id.

# 42. Rahmatulah Enayatullah Ahmed

Address: Upon information and belief, the individual can be contacted through

the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036. Subject: *Id.* 

# 43. Mahmud Said

Address: Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036. Subject: *Id*.

# 44. Ali al Thaqafi

<u>Address</u>: P.O. Box 537, Makkah, SA. Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036. Subject: *Id*.

# 45. Ahmad Qurban

<u>Address</u>: P.O. Box 537, Makkah, SA. Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036. Subject: *Id*.

# 46. Musa al Mogasme

Address: P.O. Box 537, Makkah, SA. Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036. Subject: *Id.* 

# 47. Dr. Adnan Basha

Address: Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

<u>Subject</u>: Information relating to Plaintiffs' claims against the International Islamic Relief Organization.

# 48. Ahmed Thomson, Esq.

<u>Address</u>: Wynn Chambers, Winchester House 259-269 Old Marylebone Road, NW1 5RA London, United Kingdom. Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036. <u>Subject</u>: *Id*.

#### 49. Sameer al Radhi

<u>Address</u>: Mecca, Saudi Arabia. Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036. Subject: *Id.* 

# 50. Mahmud Said

Address: Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Id.

# 51. Faiz Wardy

<u>Address</u>: Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Id.

# 52. Hamdoun Muhsin Ben Abdel Rahman

Address: Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Id.

# 53. Kuswanto Abdul Rahman

<u>Address</u>: Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Id.

# 54. Fahmi Abu Bakr Bin Sinker

<u>Address</u>: Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Id.

# 55. Aidarous Rafik

<u>Address</u>: Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Id.

# 56. Hamdoun Sharif Hidayet

<u>Address</u>: Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Id.

# 57. Ashraf Abdul Hakeem Mogahed

Address: Cairo, Egypt. Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

# 58. Ali al Geries

Address: Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Id.

# 59. Fahd bin Muhammad Sanad al Harbi

<u>Address</u>: Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Id.

# 60. Abdul Kareem Khalil Othman al Mousa

<u>Address</u>: IIRO office, Jordan. Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Id.

# 61. Abdul Rauf Khalaf al Sharman

Address: IIRO office, Bosnia. Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Id.

# 62. Mangom Ceesay

<u>Address</u>: IIRO office, Senegal. Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Id.

# 63. Ismail Isaac Haron

Address: IIRO office, Nigeria. Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Id.

# 64. Saleh al Dhebiani

Address: IIRO office, Ethiopia. Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Id.

#### 65. Ismat al Bahiti

Address: IIRO office, Balkan. Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

# 66. Marco Rochat

<u>Address</u>: 3, Qual du Mont Blanc, P.O. Box 1494-1211 Geneva 1, Switzerland <u>Subject</u>: Information relating to Plaintiffs' claims against Wa'el Hamza Jelaidan.

#### 67. Alexander Theocharides

Address: 3, Qual du Mont Blanc, P.O. Box 1494-1211 Geneva 1, Switzerland Subject: *Id.* 

# 68. Jamal Ahmad Khashoggi

Address: Jeddah, Saudi Arabia

Subject: Id.

# 69. Badr Almotawa

Address: Jeddah, Saudi Arabia

Subject: Id.

# 70. Faculty for Soil Science Courses at Eastern Kentucky University

Address: 521 Lancaster Avenue, Richmond, Kentucky 40475

Subject: Id.

# 71. Faculty for Range Management Courses at University of Arizona, Tucson

Address: The University of Arizona, Tucson, AZ 85721

Subject: Id.

# 72. General Parvez Musharaff

Address: Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Id.

73. H.R.H. Prince Talal bin Abdul Aziz al Saud

Address: Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Id.

# 74. H.E. Abdullah bin Saleh al Obaid

Address: Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Id.

#### 75. Shaukat Aziz

Address: Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

# 76. Lt. Gen. Moin-ud Din Halder

<u>Address</u>: Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Id.

# 77. Lt. Gen. Muhammad Safdar

Address: Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Id.

# 78. Air Marshal Azim Jasim al Hill

<u>Address</u>: Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Id.

# 79. H.E. Dr. Adnan Khalil Basha

Address: Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Id.

# 80. H.E. Dr. Abdual Malik al Hamar

<u>Address</u>: Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Id.

# 81. H.E. Al Sheik Hamad al Zamil

Address: Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Id.

# 82. Abdul Moshin al Idris

Address: Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Id.

#### 83. Majid Nizani

<u>Address</u>: Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

# 84. Taha al Alwani

<u>Address</u>: Upon information and belief, the individual can be contacted through his attorneys at Luque Marino, 910 17<sup>th</sup> Street, N.W., Suite 800, Washington, D.C. 20006, and Law Office of Steven Barentzen, 1575 Eye Street, N.W., Suite 300, Washington, D.C. 20005.

Subject: Information relating to Plaintiffs' claims against Jamal Barzinji.

# 85. Muhammad Ashraf

Address: Upon information and belief, the individual can be contacted through the attorneys at Luque Marino, 910 17<sup>th</sup> Street, N.W., Suite 800, Washington, D.C. 20006, and Law Office of Steven Barentzen, 1575 Eye Street, N.W., Suite 300, Washington, D.C. 20005.

Subject: Id.

# 86. M. Omar Ashraf

<u>Address</u>: Upon information and belief, the individual can be contacted through the attorneys at Luque Marino, 910 17<sup>th</sup> Street, N.W., Suite 800, Washington, D.C. 20006, and Law Office of Steven Barentzen, 1575 Eye Street, N.W., Suite 300, Washington, D.C. 20005.

Subject: Id.

# 87. M. Yaqub Mirza

<u>Address</u>: Upon information and belief, the individual can be contacted through the attorneys at Luque Marino, 910 17<sup>th</sup> Street, N.W., Suite 800, Washington, D.C. 20006, and Law Office of Steven Barentzen, 1575 Eye Street, N.W., Suite 300, Washington, D.C. 20005.

Subject: Id.

#### 88. Samir Salah

Address: Upon information and belief, the individual can be contacted through the attorneys at Luque Marino, 910 17<sup>th</sup> Street, N.W., Suite 800, Washington, D.C. 20006, and Law Office of Steven Barentzen, 1575 Eye Street, N.W., Suite 300, Washington, D.C. 20005. Subject: *Id*.

# 89. Ahmed Totonji

Address: Upon information and belief, the individual can be contacted through the attorneys at Luque Marino, 910 17<sup>th</sup> Street, N.W., Suite 800, Washington, D.C. 20006, and Law Office of Steven Barentzen, 1575 Eye Street, N.W., Suite 300, Washington, D.C. 20005.

Subject: *Id*.

# 90. Iqbal Unus

Address: Upon information and belief, the individual can be contacted through the attorneys at Luque Marino, 910 17<sup>th</sup> Street, N.W., Suite 800, Washington, D.C. 20006, and Law Office of Steven Barentzen, 1575 Eye Street, N.W., Suite

300, Washington, D.C. 20005.

Subject: Id.

91. Yousef Nada

Address: Unknown

Subject: Id.

92. Cherif Sedky

Address: Upon information and belief, the individual resides in the United States.

Subject: Id.

93. Sulaiman al Rajhi

Address: Unknown

Subject: Id.

94. Saleh al Wohaibi

Address: Unknown

Subject: Information relating to Plaintiffs' claims against the World Assembly of

Muslim Youth.

95. Dr. Manih ibn Hammad al Junahi

Address: Saudi Arabia

Subject: Id.

96. Dr. Tawfeeq ibn Ahmed al Qusayyer

Address: Unknown

Subject: Id.

97. Dr. Ahmad Abdul Qadir Bahafidhallah

Address: Unknown

Subject: Id.

98. Dr. Abdul Hameed Abu Soliman

Address: Unknown

Subject: Id.

99. Fadel Soliman

Address: Jeddah Saudi Arabia

Subject: Id.

100. Ibrahim Abdullah

Address: Egypt

Subject: Id.

101. Anwar Hajjaj

Address: Unknown

#### 102. Abdullah bin Laden

Address: Upon information and belief, the individual can be contacted through the Saudi Binladin Group, Prince Abdullah Street, P.O. Box 122962, 21332, Jeddah Saudi Arabia.

Subject: Id.

# 103. Perouz Sedaghaty

Address: Upon information and belief, the individual is incarcerated in the United States and can be contacted through the attorneys at Bernabei & Wachtel, 1775 T Street, N.W., Washington, D.C. 20009.

<u>Subject</u>: Information relating to Plaintiffs' claims against the Al Haramain Islamic Foundation.

#### 104. Soliman al Buthe

<u>Address</u>: Upon information and belief, the individual can be contacted through the attorneys at Bernabei & Wachtel, 1775 T Street, N.W., Washington, D.C. 20009.

Subject: Id.

# II. Individuals associated with the Dubai Islamic Bank. Individuals include, but are not limited to:

#### 1. Osama bin Laden

Address: Unknown

<u>Subject</u>: Individual has information regarding a number of subject matters relative to Plaintiffs' claims, including without limitation: (i) the origins of al Qaeda; (ii) the financial and logistical infrastructure created to support al Qaeda; (iii) al Qaeda's funding, including support from purported Islamic charitable organizations, Islamic financial institutions, and foreign states such as Saudi Arabia; (iv) al Qaeda's-related terrorist attacks or plots; (v) al Qaeda's expansion and participation in other regional jihad campaigns; (vi) al Qaeda's association with related terrorist organizations; and (vii) Dubai Islamic Bank's provision of material and financial support to terrorist organizations such as al Qaeda.

# 2. Mustafa Ahmed al Hisawi

<u>Address</u>: United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba. <u>Subject</u>: *Id*.

# 3. Ali Abdul Aziz Ali

<u>Address</u>: United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba. <u>Subject</u>: *Id*.

# 4. Saidi Madani al Tayyib

Address: Unknown

Subject: Id.

# 5. Sheikh Mohammed bin Rashid Al Maktoum

Address: Unknown

<u>Subject</u>: Dubai Islamic Bank's provision of material and financial support to Osama bin Laden and the al Qaeda terrorist organization.

# 6. Saeed Ahmad Lootah

Address: Unknown

Subject: Id.

# 7. Sheikh Yousef al Qaradawi

Address: Unknown

Subject: Id.

# 8. Dr. Hussain Hamid Hassan

Address: Unknown

Subject: Id.

# 9. Dr. Ajeel Jassem Nashmi

Address: Unknown

Subject: Id.

# 10. Sheikh Mohammed Abdul Razak Alsidiq

Address: Unknown

Subject: Id.

# 11. Sheikh Ali Muhssein al Din Qaradaghi

Address: Unknown

Subject: Id.

# 12. Dr. Mohammed Abdul Hakim Zoeir

Address: Unknown

Subject: Id.

#### 13. Muhammad Azeem Memon

Address: Unknown

Subject: Id.

# 14. Ambassador James Foley

Address: Upon information and belief, the individual can be contacted through

the office of the U.S. Ambassador to the Republic of Croatia.

Subject: Id.

# 15. George J. Tenet

Address: Upon information and belief, the individual can be contacted through

Allen & Company LLC, 711 Fifth Avenue, New York, New York.

Subject: Id.

# 16. Madeline K. Albright

Address: Upon information and belief, the individual can be contacted through the Partnership For a Secure America, 2000 P Street, N.W., Suite 505,

Washington, D.C. 20036.

Subject: Id.

- JJ. Individuals associated with the Muslin World League. Individuals include, but are not limited to:
  - 1. Dr. Abdullah bin Abdul Mohsen al Turki

Address: Unknown

<u>Subject</u>: Muslim World League's provision of material and financial support to

Osama bin Laden and the al Qaeda terrorist organization.

2. Dr. Abdullah bin Saleh al Obaid

Address: Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Id.

3. Dr. Hassan A.A. Bahafzallah

Address: Unknown

Subject: Id.

4. Wa'el Hamza Jelaidan

Address: Unknown

Subject: Id.

5. M. Yaqub Mirza

Address: Upon information and belief, the individual can be contacted through the attorneys at Luque Marino, 910 17<sup>th</sup> Street, N.W., Suite 800, Washington, D.C. 20006, and Law Office of Steven Barentzen, 1575 Eye Street, N.W., Suite 300, Washington, D.C. 20005.

Subject: Id.

Arafat El Asahi Address: Unknown

Subject: Id.

7. Ihab Ali

6.

Address: Unknown

Subject: Id.

8. Wadih El Hage

Address: Upon information and belief, the individual is incarcerated in the United States and can be contacted through the Department of Justice and/or the Federal Bureau of Prisons.

Subject: Id.

9. Stuart A. Levey

Address: Upon information and belief, the individual resides in the United States

and can be contacted through the Department of the Treasury. Subject: Id.

#### KK. Individuals associated with the International Islamic Relief Organization. Individuals include, but are not limited to:

#### 1. Adnan Basha

Address: Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: International Islamic Relief Organization's provision of material and financial support to Osama bin Laden and the al Qaeda terrorist organization.

#### 2. Mohammed Jamal Khalifa

Address: Unknown

Subject: Id.

#### 3. Abd al Hamid Sulaiman al Mujil

Address: Unknown

Subject: Id.

#### 4. Wa'el Hamza Jelaidan

Address: Unknown

Subject: Id.

#### 5. Abu Hamman al Saudi

Address: Unknown

Subject: Id.

#### Shaykh Ahmed al Gamdin 6.

Address: Unknown

Subject: Id.

#### 7. Abdel Aziz Zaher

Address: Unknown

Subject: Id.

#### Jamal al Jibouri 8.

Address: Unknown

Subject: Id.

#### 9. Mahmoud Jaballah

Address: Unknown

Subject: Id.

#### 10. Sayed Abu Nesir

Address: Unknown

Subject:

11. Muhammad Sa'd Darwish al Shazy

Address: Unknown

Subject: Id.

12. Stuart A. Levey

Address: Upon information and belief, the individual resides in the United States

and can be contacted through the Department of the Treasury.

Subject: Id.

- LL. Individuals associated with the World Assembly of Muslim Youth. Individuals include, but are not limited to:
  - 1. Adel Batterjee

Address: Unknown

Subject: World Assembly of Muslim Youth's provision of material and financial

support to Osama bin Laden and the al Qaeda terrorist organization.

2. Amir Khattab

Address: Unknown

Subject: Id.

3. Dr. Maneh al Jahari

Address: Unknown

Subject: Id.

4. Ahmed Ajaj

Address: Unknown

Subject: Id.

5. Abdullah bin Laden

> Address: Upon information and belief, the individual can be contacted through the Saudi Binladin Group, Prince Abdullah Street, P.O. Box 122962, 21332,

Jeddah Saudi Arabia.

Subject: Id.

6. Omar bin Laden

> Address: Upon information and belief, the individual can be contacted through the Saudi Binladin Group, Prince Abdullah Street, P.O. Box 122962, 21332,

Jeddah Saudi Arabia.

Subject: Id.

Nazir Qureshi 7.

Address: Unknown

Subject: Id.

8. Sayed Ali Shah Geelani

Address: Unknown

9. Dr. Mohammed Ayyub Thukar

Address: Unknown

Subject: Id.

10. Stuart A. Levey

Address: Upon information and belief, the individual resides in the United States

and can be contacted through the Department of the Treasury.

Subject: Id.

MM. Individuals associated with the Al Haramain Islamic Foundation. Individuals include, but are not limited to:

1. Aqeel Abdulaziz al Aqil

Address: Unknown

<u>Subject</u>: Al Haramain Islamic Foundation's provision of material and financial

support to Osama bin Laden and the al Qaeda terrorist organization.

2. Soliman al Buthe

Address: Upon information and belief, the individual can be contacted through the attorneys at Bernabei & Wachtel, 1775 T Street, N.W., Washington, D.C.

20009.

Subject: Id.

3. Perouz Sedaghaty

Address: Upon information and belief, the individual is incarcerated in the United States and can be contacted through the attorneys at Bernabei & Wachtel,

1775 T Street, N.W., Washington, D.C. 20009.

Subject: Id.

4. Mansour al Kadi

Address: Unknown

Subject: Id.

5. Stuart A. Levey

Address: Upon information and belief, the individual resides in the United States

and can be contacted through the Department of the Treasury.

Subject: Id.

NN. Individuals associated with the Rabita Trust. Individuals include, but are not limited to:

1. Wa'el Hamza Jelaidan

Address: Unknown

Subject: Rabita Trust's provision of material and financial support to Osama bin

Laden and the al Qaeda terrorist organization.

2. Stuart A. Levey

Address: Upon information and belief, the individual resides in the United States

and can be contacted through the Department of the Treasury. Subject: *Id*.

# OO. Individuals associated with Sana Bell, Inc. Individuals include, but are not limited to:

1. M. Yaqub Mirza

<u>Address</u>: Upon information and belief, the individual can be contacted through the attorneys at Luque Marino, 910 17<sup>th</sup> Street, N.W., Suite 800, Washington, D.C. 20006, and Law Office of Steven Barentzen, 1575 Eye Street, N.W., Suite 300, Washington, D.C. 20005.

<u>Subject</u>: Sana Bell, Inc.'s provision of material and financial support to Osama bin Laden and the al Qaeda terrorist organization.

2. Dr. Abdulrahim al Saati

Address: Unknown

Subject: Id.

3. Dr. Farid Yasin Qurashi

Address: Unknown

Subject: Id.

4. Sulaiman al Rajhi

Address: Unknown

Subject: Id.

5. Ibrahim Afandi

Address: Unknown

Subject: Id.

6. Dr. Mohammed Abdu Yamani

Address: Unknown

Subject: Id.

7. Saleh Kamel

Address: Unknown

Subject: Id.

8. Sandra Y. K. Loder

Address: Unknown

Subject: Id.

9. James M. Towarnicky

Address: Unknown

Subject: Id.

10. James T. Montgomery

Address: Unknown

#### 11. Sulaiman al Ali

Address: Unknown

Subject: Id.

#### 12. Soliman Biheiri

Address: Unknown

Subject: Id.

#### PP. Individuals associated with Sanabel al Kheer, Inc. Individuals include, but are not limited to:

#### 1. Dr. Abdullah bin Saleh al Obaid

Address: Unknown

Subject: Sanabel al Kheer, Inc.'s provision of material and financial support to

Osama bin Laden and the al Oaeda terrorist organization.

#### 2. Dr. Hassan A.A. Bahafzallah

Address: Unknown

Subject: Id.

#### 3. M. Yaqub Mirza

Address: Upon information and belief, the individual can be contacted through the attorneys at Luque Marino, 910 17<sup>th</sup> Street, N.W., Suite 800, Washington, D.C. 20006, and Law Office of Steven Barentzen, 1575 Eye Street, N.W., Suite 300, Washington, D.C. 20005.

Subject: Id.

#### 4. Abdelmoniem M. El Hillali

Address: Upon information and belief, the individual can be contacted through the attorneys at Manning Sossamon PLLC, 1120 20<sup>th</sup> Street, N.W., Suite 700N, Washington, D.C. 20036.

Subject: Id.

#### 5. Dr. Abdul Rahmen bin Abdullah al Zaid

Address: Unknown

Subject: Id.

#### 6. Khalid Fadlalla

Address: Unknown

Subject: Id.

#### 7. Gregory Brown

Address: Upon information and belief, the individual can be contacted through the attorneys at Manning Sossamon PLLC, 1120 20<sup>th</sup> Street, N.W., Suite 700N, Washington, D.C. 20036.

# II. DESCRIPTION OF RELEVANT DOCUMENTS BY CATEGORY AND LOCATION

Plaintiffs in these consolidated proceedings may use the following categories of documents to support their claims. All documents gathered on behalf of the Plaintiffs through their own independent investigations concerning al Qaeda and the September 11, 2001 attacks, including any such documents requested under the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552, et seq., as amended, or those documents collected from the vast public record, represent privileged work product. The identification of any such documents in these Amended Initial Disclosures does not waive the attorney-client privilege, the work product doctrine, or any other applicable privilege.

- 1. Official designations, press releases, evidentiary memoranda, and other documentation and materials from the U.S. Department of the Treasury and the Office of Foreign Assets Control relative to the designation of individuals and entities identified on the Specially Designated Nationals and Blocked Persons list, including without limitation, all individuals and entities designated as Specially Designated Global Terrorists ("SDGT") pursuant to E.O. 13224.
- 2. Official designations, press releases, evidentiary memoranda, and other documentation and materials from the United Nations Security Council's al Qaida and Taliban Sanctions Committee relative to the individuals and entities identified as having been associated with al Qaida and/or the Taliban, and which are named on the Consolidated List maintained by the Committee at www.un.org/sc/committees/1267/.
- 3. U.S. Department of Defense Combatant Status Review Board unclassified summaries of evidence for Combatant Status Review Tribunals ("CSRT"), High Value Detainee ("HVD") summaries, unclassified detainee statements and testimony, Administrative Review Board transcripts and summaries of evidence, and other documentation and materials relating to those individuals who are currently, or were previously, incarcerated at the U.S. Naval Base at Guantanamo Bay, Cuba.
- 4. The July 2004 Report of the National Commission on Terrorist Attacks Upon the United States ("The 9-11 Commission Report"), including without limitation, 9-11 Commission Staff Monographs and Statements, sworn witness testimony and statements before the Commission, and other 9-11 Commission documentation and materials.

- 5. The December 2002 Report of the Joint Inquiry into the Terrorist Attacks of September 11, 2001, by the House Permanent Select Committee on Intelligence and the Senate Select Committee on Intelligence, including without limitation, sworn witness testimony and statements before the Congressional Joint Inquiry, and other Congressional Joint Inquiry documentation and materials.
- 6. Sworn witness testimony, statements, exhibits, transcripts, and other documentation and materials from U.S. House of Representatives committee hearings and/or U.S. Senate committee hearings regarding the September 11, 2001 attacks, al Qaeda, and terrorism-related issues.
- 7. Pleadings, exhibits, witness statements, transcripts, evidentiary submissions, and other documentation and materials from the International Criminal Tribunal for the Former Yugoslavia ("ICTY") and the Office of the Prosecutor relative to the ICTY's extensive investigations and prosecutions of individuals for crimes committed in the former Yugoslavia.
- 8. Pleadings, exhibits, witness statements, transcripts, evidentiary submissions, and other documentation and materials from trials that are directly or indirectly related to al Qaeda and terrorism, including without limitation, any similar trials, prosecutions, legal proceedings, or investigations conducted in the United States, in other foreign countries, or within international organizations or bodies such as the United Nations.
- 9. Documentation and materials from U.S. Government departments and agencies obtained via the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552, et seq., as amended.
- United States and foreign government intelligence reports and/or summaries, 10. terrorism reports and/or summaries, terrorism investigation reports and/or summaries, and other documentation and materials regarding: (i) the origins of al Oaeda relative to the "holy war" against the Soviet occupation of Afghanistan; (ii) the influx of foreign mujahideen into Afghanistan from various parts of the Muslim world to fight the Soviet forces and defend Afghani Muslims; (iii) the vast financial and logistical infrastructure that was created to support the mujahideen opposition to the Soviet occupation of that country; (iv) the ostensible charitable organizations that operated within that infrastructure (including the Saudi-based charities such as the Muslim World League, International Islamic Relief Organization, Benevolence International Foundation, and the Saudi Red Crescent, among others); and (v) Osama bin Laden's goal, as the Soviets withdrew from Afghanistan in 1989, to spread the jihadist movement to regions outside of Afghanistan, and to wage war with the United States of America, which he believed to be the true enemy of Islam.

- 11. United States and foreign government intelligence reports and/or summaries, terrorism reports and/or summaries, terrorism investigation reports and/or summaries, and other documentation and materials regarding al Qaeda's participation in other regional jihad campaigns following the Soviet-Afghan conflict, including without limitation: Bosnia, Chechnya, Kosovo, Sudan, Kashmir, Pakistan, Afghanistan, Iraq, Turkey, Indonesia, Malaysia, Algeria, the Philippines, Somalia, Palestine, Yemen, Kenya, Tanzania, and Egypt.
- 12. United States and foreign government intelligence reports and/or summaries, terrorism reports and/or summaries, terrorism investigation reports and/or summaries, and other documentation and materials regarding any al Qaeda-related terrorist attack or plot, including without limitation: (i) the 1993 World Trade Center bombing; (ii) the 1993 killing of U.S. soldiers in Somalia ("Battle of Mogadishu"); (iii) the 1996 bombing of the Khobar Towers barracks in Dhahran, Saudi Arabia; (iv) the Operation Bojinka Plot to assassinate Pope John Paul II during a planned January 1995 visit to the Philippines and to simultaneously attack multiple U.S. airliners as they flew over the Pacific Ocean from Asia to the United States; (v) the 1997 U.S. Embassy bombings in Kenya and Tanzania; (vi) the 2000 Millennium plot to bomb the Los Angeles International airport, attack various targets in Jordan, and bomb the U.S.S. Sullivan in Yemen; (vii) the 2000 attack on the U.S.S. Cole; (viii) the September 11, 2001 attacks; (ix) the 2001 attempted bombing of American Airlines Flight 63 by convicted shoe-bomber Richard Colvin Reid; (x) the 2004 Madrid train bombings; (xi) the 2005 London bombings; and (xii) the 2009 Christmas Day attempted bombing of Northwest Airlines Flight 253 by Umar Farouk Abdulmutallab.
- 13. United States and foreign government intelligence reports and/or summaries, terrorism reports and/or summaries, terrorism investigation reports and/or summaries, and other documentation and materials regarding funding for terrorist organizations such as al Qaeda, including without limitation: (i) donations to Islamic charities and other benevolent organizations; (ii) zakat contributions; (iii) hawala transactions; (iv) the role of Islamic financial institutions such as National Commercial Bank, Al Rajhi Banking and Investment Corp., and Dubai Islamic Bank, among others, in knowingly providing banking and financial services to Osama bin Laden and his al Qaeda network; (v) off-shore banking; (vi) money laundering; and (vii) other terrorism-financing schemes.
- 14. Media reports and press clippings relative to Osama bin Laden, al Qaeda, and the September 11, 2001 attacks, including without limitation, news stories regarding: (i) the origins of al Qaeda and the "holy war" against the Soviet occupation of Afghanistan; (ii) the formation of al Qaeda following the Soviet-Afghan conflict and the founding members of the terrorist organization; (iii) al Qaeda's participation in other regional jihad campaigns, particularly in Bosnia, Chechnya, Indonesia, Pakistan, the Philippines, and Sudan, which enabled the terrorist group to expand its sphere of influence throughout the globe; (iv) bin Laden's anti-American and anti-Western views; (v) al Qaeda-related terrorist attacks or plots around the globe; (vi) terrorism financing; (vii) the provision of financial and

material support to al Qaeda and other terrorist groups by purported Islamic charitable organizations such as the Muslim World League, International Islamic Relief Organization, al Haramain Islamic Foundation, World Assembly of Muslim Youth, Saudi Joint Relief Committee for Kosovo and Chechnya, Third World Relief Agency, Saudi Red Crescent, Saud High Commission, Rabita Trust, and the Muwafaq Foundation, among others; (viii) the role of Islamic financial institutions such as National Commercial Bank, Al Rajhi Banking and Investment Corp., and Dubai Islamic Bank, among others, in providing banking and financial services to bin Laden and his al Qaeda network; (ix) the provision of material and financial support to bin Laden and his al Qaeda network from foreign states such as Saudi Arabia and Sudan; and (x) United States and international terrorism investigations, trials, and legal proceedings.

- 15. Documents relating to the terror sponsorship activities of the defendants, including without limitation: Muslim World League; International Islamic Relief Organization; World Assembly of Muslim Youth; Al Haramain Islamic Foundation; Saudi Joint Relief Committee for Kosovo and Chechnya; Third World Relief Agency; Saudi Red Crescent; Saud High Commission; Rabita Trust; Muwafaq Foundation; Benevolence International Foundation; Perouz Sedaghaty; Wa'el Hamza Jelaidan; Mohammed Jamal Khalifa; Dubai Islamic Bank; National Commercial Bank; Khalid bin Mahfouz; Abdulrahman bin Mahfouz; Yassin al Kadi; Al Rajhi Banking and Investment Corp.; Suleiman al Rajhi; Al Shamal Bank; Faisal Islamic Bank-Sudan; Tadamon Islamic Bank, and others.
- 16. Fatwas and other recorded statements by Osama bin Laden, Ayman al Zawahiri, and other senior members of al Qaeda specifically calling for jihad against the United States and other Western allies.
- 17. Fatwas and other recorded statements by Saudi religious figures, including without limitation, Sheik Abdul Aziz Bin Baz.
- 18. Fatwas and other recorded statements by representatives of the Dubai Islamic Bank.
- 19. Fatwas and other recorded statements by officials and other individuals associated with Saudi Arabian Islamic charitable organizations, including without limitation: Muslim World League; International Islamic Relief Organization; World Assembly of Muslim Youth; Al Haramain Islamic Foundation; and others.
- 20. Speeches, statements, and other formal remarks by officials and other individuals associated with Saudi Arabian Islamic charitable organizations, including without limitation: Muslim World League; International Islamic Relief Organization; World Assembly of Muslim Youth; Al Haramain Islamic Foundation; and others.
- 21. Journals, newsletters, books, and other publications issued by the Muslim World League, International Islamic Relief Organization, and other defendants.
- 22. Documents obtained via Letters Rogatory.

23. Federal, state, or local filings by the defendants, including without limitation: tax records; tax returns; real estate records; corporate records; Form 990s; and Form 1023s.

The aforementioned documents are in the possession of the Plaintiffs' Executive Committees.

# III. COMPUTATION OF DAMAGES

Per the Court's Order, the calculation of damages has been deferred until after the completion of liability discovery. *See* Judge Frank Maas's July 15, 2010 Order (MDL Docket No. 2260).

# IV. INSURANCE POLICIES

Not applicable.

Dated: December 31, 2010

Respectfully submitted,

THE MDL 1570 PLAINTIFFS EXECUTIVE COMMITTEES

# **CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the Plaintiffs' Amended Initial Disclosures was filed electronically this 31st day of December 2010. Notice of this filing will be sent to all parties in 03 MDL 1570 by operation of the Southern District of New York's Electronic Case Filing ("ECF") system. Parties may access this filing through the Court's ECF system.

J. Scott Tarbutton, Esq.

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